UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
---X
VICTOR CALLENDER,

PLAINTIFF,

-against- Case No.: 15-CV-05813(AKH)

FORSTER & GARBUS, LLP et ano.,

DEFENDANT.
---X

DATE: October 24, 2016

TIME: 3:11 p.m.

DEPOSITION of a Non-Party, RONALD J. FERRARO, taken by the Plaintiff, pursuant to a Subpoena and to the Federal Rules of Civil Procedure, held at The Law Office of Ahmad Keshavarz, 16 Court Street, 26th Floor, Brooklyn, New York 11241, before Anna Vortsman, a Notary Public of the State of New York.

A P P E A R A N C E S:

THE LAW OFFICE OF AHMAD KESHAVARZ
Attorney for the Plaintiff
VICTOR CALLENDER
16 Court Street, 26th Floor
Brooklyn, New York 11241
BY: AHMAD KESHAVARZ, ESQ.

RIVKIN RADLER LLP
Attorneys for the Defendants
FORSTER & GARBUS, LLP et ano.
926 RXR Plaza
Uniondale, New York 11556
BY: MATTHEW T. FEINMAN, ESQ.

ALSO PRESENT:

JESSICA MOODY

* * *

F E D E R A L S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and between the counsel for the respective parties herein that the sealing, filing and certification of the within deposition be waived; that the original of the deposition may be signed and sworn to by the witness before anyone authorized to administer an oath, with the same effect as if signed before a Judge of the Court; that an unsigned copy of the deposition may be used with the same force and effect as if signed by the witness, 30 days after service of the original & 1 copy of same upon counsel for the witness.

IT IS FURTHER STIPULATED AND AGREED that all objections except as to form, are reserved to the time of trial.

* * * *

R.J. FERRARO

R O N A L D J. F E R R A R O, called as a witness, having been first duly sworn by a Notary Public of the State of New York, was examined and testified as follows:

THE REPORTER: Please state your name for the record.

THE WITNESS: Ronald J. Ferraro.

THE REPORTER: What is your address?

THE WITNESS: 103 Franklin Street, 2nd Floor, Elmont, New York 11003.

EXAMINATION BY

MR. KESHAVARZ:

Q. Ferraro?

A. Yep.

Q. Thank you, Mr. Ferraro, for being here.

A. Sure.

Q. In preparation for your deposition today, have you spoken with anyone?

A. Just my attorneys.

Q. And who are your attorneys?

A. Rivkin Radler.

Q. Anyone else?

R.J. FERRARO

A. Nope.
Q. Who at Rivkin Radler?
A. Mr. Feinman.
Q. Anyone else?
A. Ms. Lastorino.
Q. Anyone else?
A. Nope.
Q. Did you retain Rivkin Radler?
A. I didn't.
Q. To your knowledge, has anyone retained Rivkin Radler for you?
MR. FEINMAN: Let's be careful about privilege here.
MR. KESHAVARZ: No. That's not the question.
Q. The question is: You said you have not retained Rivkin Radler to represent you for this deposition. You have not or you have?
A. I have not.
Q. So has anyone, to your knowledge, retained Rivkin and Radler to represent you at this deposition?
A. I'm assuming.

R.J. FERRARO

MR. FEINMAN: I just want to make sure he's understanding the question.

THE WITNESS: Right.

Q. I apologize in advance. I'm going to cough a bit today.

A. It's okay.

Q. And I apologize for that.

Maybe we can take one step at a time.

(Whereupon, the subpoena was marked as Plaintiff's Exhibit 1 for identification as of this date by the Reporter.)

BY MR. KESHAVARZ:

Q. A few ground rules for a deposition: Have you ever had your deposition taken before, sir?

A. Nope.

Q. Have you ever deposed anyone before?

A. No.

Q. If I ask you a question that you don't understand, will you please ask me to rephrase it?

R.J. FERRARO

A. Okay.
Q. If I ask you a question and you don't ask me to rephrase it, is it reasonable for me to assume that you understood the question?
A. I think it's fair.
Q. During the course of the deposition, opposing counsel might make an objection as to form, but unless you're instructed otherwise, you're still to answer the question.
Do you understand that?
A. Yep.
Q. Let me show you what's been marked as Plaintiff's Exhibit 1. Is this the subpoena by which you're attending today's deposition?
A. Yes.
Q. Did you review a copy of this deposition subpoena prior to your deposition today?
A. I probably looked at it the night that I got it and that was it.
Q. If you will go to the last page,

R.J. FERRARO

and let me know when you're there.
You see the list of documents to produce for your deposition?
A. Yes.
Q. Have you brought any documents responsive to these requests to the deposition?
A. No.
Q. Why not?
A. Don't have any of the documents in my possession.
Q. You don't have any documents in your possession, custody, or control regarding the lawsuit by Discover Bank against Mr. Callender?
A. I just have a copy of the subpoena with me. That's it.
Q. Do you have any other documents in your possession, custody, or control at any location regarding the Discover lawsuit against Mr. Callender?
A. No.
Q. Do you have any written documents reflecting communications between yourself

R.J. FERRARO

and Forster & Garbus regarding the Plaintiff or the lawsuit -- or this lawsuit?

A. No.

Q. Any documents with Forster & Garbus regarding your deposition today?

A. No.

Q. Any documents with -- without telling me what they are, do you have any documents with Rivkin and Radler regarding your deposition today?

A. No.

Q. No e-mails?

A. No e-mails.

Q. Did you sign a retainer agreement with Rivkin and Radler?

A. No.

Q. Do you have any documents reflecting an attorney-client relationship with Rivkin and Radler?

MR. FEINMAN: I'm going to object.

MR. KESHAVARZ: Okay. You can answer.

A. Can you repeat the question?

MR. KESHAVARZ: Sure. Can you

re-read the question?

(Whereupon, the referred-to question was read back by the Reporter.)

THE WITNESS: No, I don't have any documents in my possession.

BY MR. KESHAVARZ:

Q. Possession, custody, or control at any location?

A. Nothing.

Q. Have you e-mailed anyone regarding your deposition today?

A. Yes.

Q. Who?

MR. FEINMAN: To the extent that includes counsel.

Q. Well, you can identify who. Don't tell me the contents. If it is to counsel, you can identify them.

Who have you e-mailed regarding your deposition testimony today?

A. Mr. Feinman. I know there are e-mails there.

Q. Mr. Feinman, and what was the last

R.J. FERRARO

thing?
A. I said, I'm pretty sure there are e-mails there between myself and him.
Q. Have you e-mailed with anyone else regarding your deposition testimony today?
A. Ms. Lastorino, I believe.
Q. Anyone else?
A. No.
Q. How many e-mails have you exchanged with Mr. Feinman or Ms. Lastorino regarding your deposition today?
A. I don't know.
Q. More than one?
A. I don't want to take a guess.
Q. Well, do you know if it's more than one?
A. It could be. I don't remember.
Q. When was that e-mail?
A. I believe Mr. Feinman sent me an e-mail earlier today giving me the address.
MR. FEINMAN: To the extent you're trying --
MR. KESHAVARZ: All I asked is when. My only question was when.

R.J. FERRARO

MR. FEINMAN: So if you could --

THE WITNESS: Earlier today.

BY MR. KESHAVARZ:

Q. Were there any other e-mails other than the e-mail earlier today with Mr. Feinman?

A. Probably. I just can't quantify it.

Q. So there were other e-mails, but you don't remember how many?

A. Correct.

Q. What is your understanding of the nature of this federal lawsuit, Victor Callender versus Forster & Garbus?

MR. FEINMAN: Objection to form.

A. It's -- to my understanding, there is a lawsuit from Mr. Callender against my old firm.

Q. And what's your understanding, if any, regarding the allegations in the federal lawsuit?

A. I don't have any knowledge as to the exact nature of the lawsuit.

Q. Generally speaking, what is your

R.J. FERRARO

understanding about what this federal lawsuit is about?

MR. FEINMAN: Objection to form.

A. My guess would be an FDCPA lawsuit.

Q. Anything else?

A. No.

Q. What's your understanding about what the claims in the FDCPA lawsuit are?

MR. FEINMAN: Objection.

A. That, I don't know.

Q. Do you know of -- what your involvement was in relation to the allegations in the federal lawsuit?

MR. FEINMAN: Objection to form.

A. No.

Q. Do you know why you're here today?

MR. FEINMAN: Objection to form.

A. My guess is only that because I'm no longer with the firm, there is an idea as to I might have some information that could help.

Q. What information do you have that you believe might help?

R.J. FERRARO

MR. FEINMAN: Objection to form.
A. I don't know.
Q. What is your full legal name?
A. Ronald James Ferraro.
Q. Have you ever been known by any name other than Ronald James Ferraro?
A. I usually just use my initial for my middle name. That's it. So it would be Ronald J. Ferraro.
Q. How long have you been an attorney, sir?
A. I was admitted January 2011.
Q. In what --
A. In New York. And New Jersey, November 2012.
Q. Where did you go to school?
A. Penn State.
Q. What did you do after you graduated law school?
A. With regard to what?
Q. For work.
A. After taking the bar, I went to work for a restaurant, pizzeria.
Q. What about after that?

R.J. FERRARO

A. I worked for that place for about a year. And I worked as a paralegal for a Dennis Biancanello.

Q. Say it again.

A. Biancanello. His first name is Dennis; last name, B as in "boy"-I-A-N-C-A-N-E-L-L-O.

Q. When was that, approximately?

A. I worked for him as a paralegal full-time from about August 2010 through August 2011.

Q. And what did you do there?

A. So until I got admitted, I was working as a full-time paralegal, doing basic paralegal, clerical stuff, answering phones. From there, after that, in January 2011, after I was sworn in, I worked as an attorney.

Q. Where?

A. For him.

Q. Does he do debt collection work?

A. I know he had a book of business. I don't know if he still does it. That was per diem appearances, and it could range

R.J. FERRARO

from personal injury stuff to, perhaps, it could be some debt collection stuff.

Q. Would you be the per diem attorney for his firm?

A. He usually made most of the appearances, but I did make some.

Q. Tell a jury what a per diem attorney is.

MR. FEINMAN: I'm going to object to the form of the question there.

MR. KESHAVARZ: You can answer the question.

A. Per diem attorney is an attorney that gets hired to make one appearance or for a particular situation, if the named attorney can't appear.

Q. What did you do after that?

A. I then began, in August of 2011, working for Forster & Garbus.

Q. And how long did you work there until?

A. Until April of this year, 2016.

Q. Is there any particular reason why you left Forster & Garbus in April 2016?

R.J. FERRARO

A. Yeah. I had a better job opportunity elsewhere.

Q. Where did you go?

A. I went to work as a law clerk for a judge.

Q. Which judge?

A. Judge Diamond.

Q. And where is Judge Diamond a judge at?

A. Nassau County Supreme Court.

Q. How do you like it?

A. Good.

Q. What was your title while you were working at Forster & Garbus?

A. Associate.

Q. Has your title changed from when you began in 2011 to when you left in 2016?

A. No.

Q. Did your workload change in any significant way between that period?

MR. FEINMAN: Objection to form.

A. I don't understand what you mean by "workload."

(Whereupon, the following document

R.J. FERRARO

was marked as Plaintiff's Exhibit 2 for identification as of this date by the Reporter.)

BY MR. KESHAVARZ:

Q. Mr. Ferraro, is this your copy of your LinkedIn page?

A. I can't authenticate it, because it's not -- I didn't print it out. So I don't know if there has been any changes here, but it does look substantially similar to what I have on my LinkedIn page.

Q. Okay. Please review the document and let me know when you're done.

A. Okay.

Q. Are all the statements in Exhibit 2 true?

A. Again, I can't authenticate the document, but it does look substantially similar to what I had on my LinkedIn profile.

Q. My question is: You've read Exhibit 2, correct?

A. Yeah.

Q. Are the contents in Exhibit 2

R.J. FERRARO

true?

A. Again, I can't authenticate what's in here.

Q. We can take one line at a time, if you'd like.

It says you're a principal as a law clerk to the Honorable Arthur M. Diamond; is that correct?

A. Yes.

Q. Is that statement true?

A. Yes.

Q. It says below that you were an associate attorney at Forster & Garbus LLP. Is that statement true?

A. Yes.

Q. It says that you worked at Forster & Garbus from August '11 to April of 2016. Is that statement true?

A. Yes.

Q. Okay. Read all of the sentences to yourself below that and through the next page, and let me know when you're done.

A. Okay.

Q. Are all the statements beneath

R.J. FERRARO

where it says "associate attorney" -- are all the statements on the bottom of page 1 true?

A. Yes.

Q. Go to the next page, page 2, under "associate attorney," are all the statements underneath that true?

A. Yep.

Q. Did you review the deposition testimony of Joe Leiderman prior to your testimony today?

A. No.

Q. Do you have any knowledge of the contents of the deposition testimony of Joe Leiderman?

A. No.

Q. Tell me what you did at Forster & Garbus.

A. Didn't we just go over that?

Q. What were your hours at Forster & Garbus?

A. They varied.

Q. What were your typical hours at Forster & Garbus?

R.J. FERRARO

A. I mean, I was full-time.

Q. Yes. So, typically, what were your hours, 9:00 to 5:00?

MR. FEINMAN: Objection to form.

A. No.

Q. Typically, what were your hours at Forster & Garbus? It's a simple question.

MR. FEINMAN: Objection to form.

A. It depended on the day and the week.

Q. What were your typical hours at Forster & Garbus?

MR. FEINMAN: Objection.

A. On any given week, I would work between 50 and 65 hours.

Q. Would that be your normal range of hours?

A. On any given week, yeah.

Q. You worked weekends or only weekdays?

A. Sometimes weekends.

Q. Tell me about what work you did to manage a caseload for matters throughout New York State Supreme Court and district courts

R.J. FERRARO

varying between 700 and 1400 matters at any given time, from inception to trial. That's what your web --

MR. FEINMAN: Objection to the form of the question.

A. And that's not what it says.

Q. Will you read the line "managing caseload." Read that on the record, please.

A. "Manage caseload for matters throughout New York State Supreme, City, and District Courts, varying between 700 and 1400 matters at any given time, from inception through trial."

Q. And what do you mean by that?

A. I had a responsibility as far as not only whatever cases I was assigned to manage from a paper standpoint, but also making court appearances regularly.

Q. Do you mean anything else by that?

MR. FEINMAN: Objection to the form of the question.

A. I don't recall when exactly I put this together, but -- I don't know what other explanation you're looking for.

R.J. FERRARO

Q. Well, let me just put this in lay terms.
A. Please.
Q. What were your major responsibilities at Forster & Garbus?
A. Daily court appearances, handling trials.
Q. Did you have any other main responsibilities at Forster & Garbus, other than to have daily court appearances and handling trials?
MR. FEINMAN: Objection.
A. Yeah. Some of the other responsibilities included having whatever cases were assigned to my venue, reviewing whatever paperwork came in on those cases.
Q. Any other major responsibilities at Forster & Garbus?
MR. FEINMAN: Objection to the form of the question.
A. Not that I can recall.
Q. Tell me what you mean by "daily court appearances."
MR. FEINMAN: Objection to the

R.J. FERRARO

form of the question.
A. So whenever -- obviously, I think you understand what it means when a case is put on a calendar for a pretrial conference, conferences. Cases get adjourned three, four, five times. So someone needs to go appear on behalf of the firm to answer on those cases and discuss maybe a possible resolution, or if there is any motion practice going on, discuss those issues.
My responsibility was to go and make those appearances on behalf of the firm.
Q. In which counties?
A. Do you need to know all the counties I've appeared in?
Q. Well, typically speaking, you said later on about certain venues. Were there any particular courts that you would do your appearances in more than others?
A. Yes.
Q. Where would you primarily do your appearances?
MR. FEINMAN: Objection to the

R.J. FERRARO

form of the question.

A. It depends on the time period we're discussing.

Q. Well, let me ask you this: Did your work change significantly during the time period while you were there, from 2011 to 2016?

A. I don't think my work changed significantly. I think I was given maybe more complicated matters to handle or more difficult cases.

Q. In what way?

A. Well, instead of, perhaps, dealing with a pro se, it'd be a two-attorney matter.

Q. Would that be the main difference in your workload while you were at Forster & Garbus?

A. I don't understand the question, really. Could you rephrase?

Q. Sure. Well, I was just trying to ask -- you started saying the courts you would go to changed to some extent during your time at Forster & Garbus --

R.J. FERRARO

MR. FEINMAN: Objection to the form.

Q. -- is that correct?

A. There was, when I first started, more cases on a day-to-day basis. By the time I left, it's a matter of efficiency. It seemed as if the calendars, there were less adjournments.

Q. So what did that do for your work?

A. Didn't feel like much.

Q. Would you go to do court appearances every day?

A. Yes. The only days that I didn't make court appearances, I think I called out sick once when I was there and there was a court holiday, something like that.

Q. You timed your sickness very well.

So when did you travel to go to court? When did you come back?

What were your hours in court, I guess, generally speaking?

A. It also depends on the venue.

Q. Primarily, what venues were you in? You said it changed to some extent. In

R.J. FERRARO

what way?

A. When I was first hired, I was hired to go to Queens. And there were two attorneys assigned to go to Queens at that time, and I was going to be the third.

By the time I started there, they asked if I'd go to the Bronx once or twice a week. So I did that. But because I did the trials, I was also considered a -- I guess you would say a floater. I didn't have cases just in one venue.

Q. You'd do other cases around New York City?

A. Yes.

Q. And primarily in the five boroughs?

A. I've done -- yes. At one point or another, yes.

Q. So your court appearances would be how you spent most of your days?

A. Yeah. They would monopolize the morning.

Q. And what would you do in the afternoon?

R.J. FERRARO

A. Whenever I would get back to the office, I'd put in my notes from the day, prepare myself for the next day's appearances, respond to any phone calls, typical attorney stuff.

Q. And that was pretty much your typical day?

A. Yes.

Q. You said for your cases work received papers -- excuse me. You said, "Cases work reviewing papers." What did you mean by that? Maybe I'm misstating your testimony, in which case I don't mean to. Well, strike that. I think you just answered the question.

So you're saying that what you did, typically, at Forster & Garbus is that you made court appearances, you came back, you typed up what happened in court, and then you got prepared for the next day's hearings or trials. Is that --

MR. FEINMAN: Objection to form.

Q. Is that an accurate summary of your basic responsibilities at Forster &

R.J. FERRARO

Garbus?

A. Yes.

Q. Did you sign income executions while you were at Forster & Garbus?

A. Yes.

Q. Did you file -- sign information subpoenas?

A. I don't remember.

Q. But you do remember signing wage garnishments, right?

A. Income executions, yeah.

Q. Income executions. Thank you.

Would you sign any other documents attempting to collect on judgments, or was that primarily your income executions?

A. I'm going to ask you to rephrase.

Q. Sure. I mean, one way you can collect on a judgment is just to sign an information subpoena and bank restraint, correct?

MR. FEINMAN: Objection to form.

MR. KESHAVARZ: You can answer.

A. I mean, I think your question is too broad as to how to collect on it.

R.J. FERRARO

You're asking how to collect on a debt or how to collect on a judgment?

Q. I'm just trying to get an idea about -- you talked about your work during the day and preparing for the next day's hearing, right? You talked about that.

I'm just trying to figure out what involvement, if any, you had in terms of collecting on judgments.

MR. FEINMAN: Objection to form.

Q. Well, let me just ask you that. What involvement, if any, did you have on the collection of judgments?

A. I think it would depend on the case.

Q. Generally speaking, what would you do to collect on judgments? Would that be a significant part of your responsibility at Forster & Garbus?

MR. FEINMAN: Objection to form.

A. Again, I think it was a case-by-case basis.

(Whereupon, the following document was marked as Plaintiff's Exhibit 3 for

R.J. FERRARO

identification as of this date by the Reporter.)

BY MR. KESHAVARZ:

Q. I'm showing you what's been marked as Plaintiff's Exhibit 3. Are you able to identify what that document is?

A. This appears to be an income execution from our office.

Q. And is that your signature on the bottom, on the first page?

A. Yes.

Q. It says your name and it says the name of Olivia DeBellis next to you; is that correct?

A. Mm-hmm.

Q. You have to say "yes" or "no" for the court reporter.

A. That's right.

Q. And were you and Ms. DeBellis the persons who would primarily be responsible for signing income executions in 2014 --

MR. FEINMAN: Objection to form.

Q. -- the date of this subpoena?

A. It always changed who was the

R.J. FERRARO

person that had to sign them. At this time, when this was printed, it was either myself was the primary and she would've been the secondary on this date.

Q. You said the people who signed the income executions changed. Would there be, generally, one or two people at any particular time who would sign the income executions?

MR. FEINMAN: Objection to form.

A. Yes.

Q. What about bank restraints; would there generally be one or two people who would sign the bank restraints?

A. Yes.

Q. Would the people who signed the income executions, generally, be the same people who signed the bank restraints?

MR. FEINMAN: Objection to form.

A. Sometimes.

Q. You, typically, didn't sign the bank restraints, right?

A. Again, it depended on the time period we're talking about.

R.J. FERRARO

Q. In what way did it change over at the time?

MR. FEINMAN: Objection to form.

A. Well, for example, let's say I had a calendar in Manhattan on a particular morning with 20-something cases. Trial got adjourned to the afternoon, and the computer system generated it for that afternoon to be signed, and I wasn't going to get back to the office. Somebody else would sign them.

Q. So how would that work? You would come to the office and there would be a computer-generated income execution for you to sign; is that right?

A. Yes.

Q. And then you would sign it and you would give it to someone else in the office?

MR. FEINMAN: Objection to form.

A. I would give it back to the people who were responsible for mailing them out.

Q. Other than someone handing you the income execution for you to sign and then giving it to somebody else in the office, was that your only involvement in issuing

R.J. FERRARO

the income execution?

MR. FEINMAN: Objection to form.

A. At this point in time, most likely.

Q. And why do you say that?

A. Because after being there for a period of time and understanding the computer system better and the process better, I would understand that this is all that I needed to do at this point in time.

Q. What was all that you needed to do at this point in time?

A. Someone hands me the income execution that's generated by our computer system, I can sign it.

Q. And that's your only involvement in the process of garnishing someone's wages; is that right?

MR. FEINMAN: Objection to form.

A. At this point in time, yes.

Q. And "at this point in time," what do you mean?

A. In December 2014, as I indicated previously, I understood our computer

R.J. FERRARO

process and our checks and balances with the system. So at this point in time, there is no further review that would've been necessary, other than signing this.

Q. From 2011 through 2014, your only reviewing -- executing on someone's wages would be for someone to give you a completed income execution to sign? Is that accurate.

MR. FEINMAN: Objection to form.

A. I'm going to ask if you can repeat the question.

Q. Let me rephrase the question.

From when you started at Forster & Garbus, in 2011, through the date of the income execution that's Exhibit 3, December of 2014, are you saying that your only involvement in the garnishing of someone's wages would be for someone to give you a completed income execution for you to sign it and to return it? Is that accurate?

MR. FEINMAN: Objection to form.

A. I remember when I first started, like most -- I think it's very natural for most attorneys to ask questions, you know.

R.J. FERRARO

How am I getting this? Why am I being asked to sign this?

By this point in time, I understood the way our systems worked and had, you know, I guess, used our computer system long enough to know what it's capable of and what it's not capable of as well as, I guess, you could say, the people that I worked with, of what they're capable of and what they're not capable of.

Q. Let me just ask you if this is an accurate statement. Your role was just to sign the income executions that were handed for you to sign? Is that accurate?

MR. FEINMAN: Objection to form.

A. As I stated earlier, by this time, my involvement was just signing the income execution put before me.

Q. Did that role change after December of 2014?

A. Did it change as to my step in the process?

Q. Yes.

A. No.

R.J. FERRARO

Q. Did it change in any way, to your knowledge?

MR. FEINMAN: Objection to form.

A. Did my role change, to my knowledge? I don't believe it did.

Q. Let me ask you: Did the process that Forster & Garbus took prior to issuing an income execution, did it change at any point while you worked at Forster & Garbus?

MR. FEINMAN: Objection to form.

A. To my knowledge, our technology was getting better and our checks were more thorough.

Q. In what way?

A. Well, I guess, for example, instead of one person skiptracing or verifying information about a place of business, they would have two and a computer system that did its own independent, let's say, review.

Q. Independent review of what or for what?

A. To my understanding, there is additional technologies out there that could

R.J. FERRARO

verify, you know, people's locations, where they live, where they work. And it was, to my understanding, that we were updating and expanding on those checks to avoid any issues.

Q. Any issues of what?

A. You know, as we discussed before, what someone's name is. You asked me if I was known by any other names. Some people use their middle initial, some people don't. You could get a hit for how many John Smiths are out there.

Q. What you're talking about now, is that the major difference in the computer system that you mean over time?

A. From the time I started there to the time I left, I think they got much more efficient and much more -- they checked things over more and had more levels of review.

Q. And I'm just asking, by "more levels of review," you mean more levels of review to make sure it's the same person, that they're restraining the right bank,

R.J. FERRARO

that they're restraining the right employer? Is that what you mean?
A. That the income execution contains the right information, from the name to the social to the judgment balance to the date it was entered, the judgment, all that information.
Q. To your knowledge, that's the only steps that were taken in terms of the improvements over the computer system while you worked there; is that right?
MR. FEINMAN: Objection to form.
A. Yes.
Q. The change in that computer method that you talked about, that's, to your knowledge, the only way that Forster & Garbus' policy changed in terms of executing on someone's wages? Is that accurate?
MR. FEINMAN: Objection to form.
A. I'm going to ask you to rephrase. I apologize.
Q. For the entire time you were there, was this change in the computer program the only change that was made at

R.J. FERRARO

Forster & Garbus in terms of executing on someone's income?

MR. FEINMAN: Objection to the form.

A. Personnel changed as well.

Q. Did that change the steps that were taken prior to restraining -- executing on someone's income?

MR. FEINMAN: Objection to the form.

A. As I indicated earlier, you had different levels of checking. So whereas, perhaps, in 2011, there might've been six steps; by 2016, there might've been eight. And a different person may be required to do each step.

Q. To your knowledge, did any of those steps involve checking e-Courts to see if the judgment had been vacated?

A. Never. Not to my knowledge.

Q. So Forster & Garbus never checked e-Courts to determine whether a judgment it was collecting on had been vacated; is that correct?

R.J. FERRARO

MR. FEINMAN: Objection to form.

A. It's common knowledge that there is not enough information available to an attorney on e-Courts, other than a court date; and even that is inaccurate depending on a venue. So if someone was tasked with checking e-Courts for information about a case, it's almost a fool's errand.

Q. Does anyone at Forster & Garbus check whether a judgment has been vacated prior to either issuing an income execution or a bank restraint?

MR. FEINMAN: Objection to form.

A. If we had knowledge of a judgment having been vacated, we would never get to the step of an income execution put on my desk.

Q. When you sign income executions, such as Exhibit 3, you're not involved in determining whether the judgment for the income execution you're signing has been vacated; is that correct?

MR. FEINMAN: Objection to the form.

R.J. FERRARO

A. Could you repeat the question? I was just going to ask to read it back. It's up to you.

Q. Let me just rephrase it.

Prior to Forster & Garbus signing income executions, including your signing of the income execution that's Exhibit 3, Forster & Garbus doesn't take any steps to determine whether the judgment had been vacated? Is that true?

MR. FEINMAN: Objection to the form.

A. There would be steps taken to verify that a judgment is valid, but there are certain things you can't account for.

Q. What steps, if any, did you take to determine whether a judgment has been vacated, prior to you signing an income execution?

MR. FEINMAN: Objection to form. I want to note on the record, are we speaking about this?

Q. Did you treat Mr. Callender differently than you treated anyone else

R.J. FERRARO

whose wages you were garnishing?
A. Did I treat Mr. Callender any different than I treated anybody else at this point in time?
MR. FEINMAN: Objection to form.
A. That's the question?
Q. Yeah.
A. No.
Q. So when you sign income executions, to your knowledge, are there any steps that were taken by Forster & Garbus to determine whether a judgment had been vacated prior to your signing of an income execution?
MR. FEINMAN: Objection to the form.
A. Yes.
Q. What?
A. I wouldn't be able to point to anything in particular with this case, if that's what your question is.
Q. By "this case," you mean Mr. Callender, correct?
A. Correct.

R.J. FERRARO

Q. To your knowledge, when you were signing income executions, did Forster & Garbus do anything to determine whether the judgments that you were signing income executions on had been vacated?

MR. FEINMAN: Again, I'm not -- are we talking about --

Q. If you don't understand the question, will you ask me to rephrase?

MR. FEINMAN: What I'm trying to do, as my role as the attorney, to just see where within the court's order this fits. So I'm not sure if you're asking about -- he is not here as a 30(b)(6) witness.

MR. KESHAVARZ: That's fine. I'm just asking what you know.

Q. So let me ask you this: To your knowledge, does Forster & Garbus take any steps to determine whether any of the judgments that they're asking you to sign income executions on were vacated?

A. Yes.

Q. To your personal knowledge, what

R.J. FERRARO

steps, if any, did Forster & Garbus do to determine whether the income executions that you were signing were for judgments that had not been vacated?
MR. FEINMAN: Put an objection.
MR. KESHAVARZ: Go ahead. You can answer.
A. You're asking what steps they took on any particular case or on this particular case?
Q. Well, you don't remember anything about Mr. Callender, specifically, do you?
A. No.
Q. You don't have any recollection of Mr. Callender's account, correct?
A. Correct.
Q. Because you sign thousands of income executions?
MR. FEINMAN: Objection to form, and there is a court order.
MR. KESHAVARZ: You can answer.
MR. FEINMAN: Well, he doesn't have to answer the portion of the number.

R.J. FERRARO

MR. KESHAVARZ: No. He testified to this already. You can answer the question.

MR. FEINMAN: I'm going to object, again. He testified to which portion of that?

MR. KESHAVARZ: You can answer the question.

THE WITNESS: Which question am I answering?

MR. KESHAVARZ: Can you read the question?

(Whereupon, the referred-to question was read back by the Reporter.)

THE WITNESS: Are you asking if I signed thousands on December 3rd of 2014, or have I signed thousands over the course of August 2011 through April 2016?

BY MR. KESHAVARZ:

Q. Take one at a time.

MR. FEINMAN: I'm going to object. The number of income executions has

R.J. FERRARO

been already addressed by the Court as the number of income executions are --

MR. KESHAVARZ: That's not accurate. You objected to the form of the question. That preserves your objection.

MR. FEINMAN: Sure.

MR. KESHAVARZ: So if you're correct, then there will be a determination whether the testimony can be used or can't be used.

MR. FEINMAN: What I was trying, before instructing the witness not to answer, to navigate this, just to put my objection, too. Maybe there is a way to ask the question that I will allow -- that I'll allow the question as opposed to instructing him not to answer it in light of the Court's order.

Q. Well, you asked if by signing thousands of income executions -- let me ask: Do you know how many income executions you sign on a regular basis?

R.J. FERRARO

MR. FEINMAN: Objection. It goes to the heart of what I'm saying. The Court's order -- the Court has already ordered: The number of income executions are not an issue in this litigation.

BY MR. KESHAVARZ:

Q. How much time would you spend signing income executions?

A. On this particular date or over the course of my employment there?

Q. While you sign income executions -- well, strike that. He already testified to what the answer is.

Let me ask you this: Do you have any personal knowledge of what steps that Forster & Garbus took to determine whether a judgment they were asking you to sign an income execution for was vacated? Do you have any personal knowledge?

A. For any particular case, no.

Q. What do you mean "for any particular case"?

A. Well, again, I'm not clear if

R.J. FERRARO

you're asking about Mr. Callender or if over the course of my five years, there was a case that, perhaps, there was a question that came up as to whether a judgment was valid or not.

Q. So you're saying, during the time that you were at Forster & Garbus, sometimes you would sign income executions and it came to light later that the judgment had been vacated? Is that what you're saying?

MR. FEINMAN: Objection to form.

A. Not to my knowledge, but I'll give you an example.

Q. Please.

A. If perhaps, let's say, a case was ready for an income execution, they found a place of business that the person -- that was valid. And then on Tuesday, we got an order to show cause in, but we didn't actually get served with it. Instead, I appeared in court randomly or a colleague of mine appeared in court. It showed up on the calendar, and sure enough there is a defendant there. And then when I came back

R.J. FERRARO

and I said, "Look, there is an order to show cause. We can't send this out," they would pull it back.

Q. I see. Other than something like that, to your knowledge, does Forster & Garbus do anything to check to see if a judgment has been vacated prior to you signing an income execution, from your own personal knowledge?

A. I wouldn't be able to recall at this period of time what checks were in place.

Q. At any period of time, to your personal knowledge, did Forster & Garbus take any steps to determine whether a judgment had been vacated prior to you signing an income execution on that judgment?

MR. FEINMAN: Objection to form.

Q. Based on your own personal knowledge.

A. At the very least, I know they get information from the client if there is a judgment valid on the case.

R.J. FERRARO

Q. Anything else?

A. Again, it would depend on a case-by-case basis.

Q. But to your personal knowledge, other than being informed by the client that there is a judgment, to your personal knowledge, does Forster & Garbus take any other steps to determine whether a judgment has been vacated prior to you signing an income execution?

MR. FEINMAN: Objection to form.

Q. To your personal knowledge, do you know of anything else or not?

A. It would depend -- it would have to depend on a case.

Q. Sitting here today, do you have any personal knowledge of any other steps Forster & Garbus took before giving you an income execution to sign to determine whether the judgment had been vacated?

MR. FEINMAN: Objection.

Q. Sitting here today, do you have any personal knowledge?

MR. FEINMAN: Objection to form.

R.J. FERRARO

A. I can't give you personal knowledge on any -- it depends on the case. It's too broad of a question.

Q. Okay. Sitting here today, can you think of any time that Forster & Garbus had reviewed an income execution prior to -- strike that.

Sitting here today, can you recall any time where you knew that Forster & Garbus had checked to see whether a judgment had been vacated prior to having you sign an income execution?

MR. FEINMAN: Objection.

A. You're asking me about any particular case, if an additional step was taken, other than asking the client?

Q. Yes. To your knowledge, sitting here today, can you recall any other step taken to determine whether a judgment had been vacated, prior to you signing an income execution?

MR. FEINMAN: Objection to form.

And I'm letting the questioning go a little, but he's here --

R.J. FERRARO

MR. KESHAVARZ: Go ahead. You can answer.

MR. FEINMAN: You understand the problem?

MR. KESHAVARZ: I understand, but you can answer the question.

Q. If you know, you know; if you don't know, you don't know. I'm just asking.

A. I understand you're just asking. I just cannot recall a particular case where they took a particular step. There always had to be a trigger.

So, for example, if let's say the defendant was -- had many cases, had multiple debts and we knew we had three of them, two of them appeared in court with an order to show cause, then they would give pause for maybe that third one; perhaps, there is an order to show cause coming.

Q. Any other examples, other than that, you can specifically recall?

A. If, perhaps, a case was handled by a prior attorney, we would ask -- depending

R.J. FERRARO

on the case, if maybe you can look at their file to confirm at what stage the litigation is at or if there was a judgment in place.

Q. Do you know, from your own personal knowledge, or not -- if you don't know, that's fine. I'm just asking if you know. Do you know if one reason Forster & Garbus does not track e-Courts prior to having its attorneys sign income executions, do you know -- strike that. Let me rephrase the question.

Do you know why Forster & Garbus does not have its attorneys or anyone else check on e-Courts on a regular basis to determine whether a judgment it's executing on has been vacated?

MR. FEINMAN: Objection.

Q. Do you know or do you not know?

A. As I indicated earlier -- actually, I think I said it specifically -- e-Courts is not an accurate way to check to see if a case has had a judgment vacated on it.

Q. Sometimes it would show and

R.J. FERRARO

sometimes it won't?

A. It depends on the venue. It depends on the clerk that day. It depends on when you look. I've seen cases where I knew a motion that I filed was submitted or scheduled to be submitted on December 1st, and it wouldn't actually reflect it was submitted until sometime in February, and at that point the Judge made a decision. That's why e-Courts is not accurate.

Q. To your personal knowledge, is that the reason that Forster & Garbus does not check e-Courts prior to you signing income executions?

MR. FEINMAN: Objection to form.

A. I'm sure it's part of the equation.

Q. Do you ever think of checking e-Courts to see if the income execution you're signing is on a punitive judgment that, in fact, been vacated?

MR. FEINMAN: Objection to form.

A. If a case had a judgment on it, it wouldn't reflect it on e-Courts,

R.J. FERRARO

necessarily. If the judgment was vacated as a result of a motion, that's one thing. If it was vacated as a result of a settlement stipulation, it would never show up on e-Courts.

(Whereupon, the following document was marked as Plaintiff's Exhibit 4 for identification as of this date by the Reporter.)

BY MR. KESHAVARZ:

Q. So most of the court appearances you handled were -- the vast majority were in New York City, Bronx, or Queens, or one of the other boroughs? Is that accurate?

A. Yes.

Q. In order to pull up something on e-Courts, you just -- you can just type in the index number, hit "return," and it'll show you what's on e-Courts, correct?

MR. FEINMAN: Objection to form.

A. Depending on a venue, yes.

Q. But, I mean, the New York City courts, right?

A. If there was a court appearance, I

R.J. FERRARO

believe it would show up on there, generally. If there was no appearance, it may not.

Q. So Exhibit No. 4 is -- does that appear to be the e-Courts Web site printout for Mr. Callender? Is that what it appears to be?

MR. FEINMAN: Objection.

A. I can't authenticate this because I didn't print it out. To my knowledge, anytime you're on a New York State e-Courts Web site, there would be a banner up here indicating such, and I don't see that here.

MR. KESHAVARZ: Do you want to print this out in color?

MS. MOODY: Sure.

Q. Looking at the first page, Callender-47, is that the screen that you would see when you type in an index number into e-Courts?

MR. FEINMAN: Objection to form.

Q. Is that the format of what you would see?

A. You could've typed in any of

R.J. FERRARO

these. Well, Discover Bank probably would have too many hits, but if I, hypothetically, had typed in this index number, if this is the correct information from there, this appears to be what it would look like.

Q. This screen that's Exhibit 4, page 47, correct?

A. Yes.

Q. So how long would it take you to type in an index number?

A. Can't quantify it.

Q. How many numbers? Ten digits? You think it would take you less than 30 seconds to type in ten digits?

MR. FEINMAN: Objection.

A. To type in the digits themselves, assuming no interruptions and my Internet is working, you know, quickly that day, perhaps.

Q. So if there has been an order to show cause, typically speaking, you would see the screen that's page 47, and then you would click to see either "motions" or

R.J. FERRARO

"showing all appearances," right?

MR. FEINMAN: Objection.

A. What was I looking for? If I hit "show all appearances," I would hope that it would show me whatever all the appearances were when I'm looking. If I hit "show all motions" and I click that, I would hope that it would show me all the motions. But, again, my experience has been: It's never accurate. I shouldn't say "never accurate." It's not reliable.

Q. Why is it not reliable?

A. As I indicated earlier, you have people updating these systems, they're clerks. Sometimes it gets put in right away; sometimes it doesn't; sometimes the information is never put in.

Q. So one thing, it's inaccurate because there might be a lag time of a couple of months between when something happens and when it gets put into e-Courts, correct?

MR. FEINMAN: Objection.

A. The lag time sometimes could be

R.J. FERRARO

significant, and it could be not at all.

Q. You used e-Courts on a regular basis, right, while you worked at Forster & Garbus?

MR. FEINMAN: Objection to form.

A. No.

Q. If judgment was vacated, the vast majority of the time there would be an e-Courts something showing that there is no order to show cause to vacate the judgment, right?

MR. FEINMAN: Objection to form.

A. Again, it depended on the time and the venue. It's possible that it would appear on e-Courts.

Q. Well, let's nail this down, because you were working mostly in New York City. You signed income executions in New York City?

A. I have in the past signed income executions in the five boroughs.

Q. And most of the income executions you signed at Forster & Garbus was in New York City?

R.J. FERRARO

A. I can't quantify it.

Q. You don't know if most of them were in New York City?

MR. FEINMAN: Objection to form.

A. You're asking me to take a guess. There are 62 counties in the state.

Q. Yeah, I know, but there are 17 million people living in New York.

You don't remember, you have no idea whatsoever most of the cases --

MR. FEINMAN: Objection.

A. I would only be taking a guess.

MR. FEINMAN: Objection to form.

If you're done with the question, then objection to form.

Q. You have no idea whether the majority of income executions you were signing were from New York City? You have no idea whatsoever; is that right?

MR. FEINMAN: Objection to form.

A. I would only be taking a guess.

Q. You have no idea, right?

MR. FEINMAN: Objection to form.

A. I think we've gone over this. I'd

R.J. FERRARO

only be taking a guess. I'm not going to take a guess.

Q. You don't know if it's most of them or not?

MR. FEINMAN: Objection to form.

A. No.

Q. Okay. If that's your testimony, that's your testimony.

MR. FEINMAN: Objection to form to the extent that's a question.

Q. So let's talk about venue. Are you saying that if an income execution -- strike that.

An order to show cause, let's say, was filed a year ago, in New York City, five boroughs. The majority -- that would usually be reflected on e-Courts, right --

MR. FEINMAN: Objection.

Q. -- that an order to show cause has been filed?

A. Sometimes.

Q. Isn't that typically true?

MR. FEINMAN: Objection to form.

A. Again, my experience has been it's

R.J. FERRARO

not always true.

Q. I didn't ask you if it was always true. My question is -- you try to narrow it down by venue, by time.

Let me just ask you: If a case is in New York City, if an order to show cause had been filed more than six months ago, isn't that usually reflected on e-Courts?

MR. FEINMAN: Objection to form.

A. We're going in circles, because you want to break it down as a generality. It's not. If you've been to Staten Island, if you've been to Brooklyn, Manhattan, Bronx, and Queens, they all operate differently. The way things are updated are totally different, from the judges' markings to the way the calendar is called. So the way e-Courts is updated is not uniformed.

Q. So? That wasn't my question. The question wasn't if it's updated or uniformed. My question is this --

A. And I've indicated to you, it's possible.

Q. Most of the time, in New York

R.J. FERRARO

City, when it's a motion to vacate a judgment or to show cause to vacate, most of the time -- so long as the order to show cause was filed more than six months ago, most of the time that's reflected on e-Courts, right?

MR. FEINMAN: Objection to the form of the question.

A. I think most likely it'll show a motion was filed by a defendant or a motion was filed by a plaintiff. It doesn't always say the relief. It doesn't always say the result.

Q. Yeah. But, typically, it shows that the order to show cause has been filed, right?

MR. FEINMAN: Objection to form.

A. If we're going to say "typically," what it typically would show, would be the motion was filed. That's the only thing I can say with certainty is most likely to appear.

Q. Well, if you were going to take someone's wages away and you knew that

R.J. FERRARO

e-Courts said that there was an order to show cause to vacate the judgment, would you take any steps before taking some of the wages, or would you sign that income execution?

MR. FEINMAN: Objection to form.

A. I'm going to ask you to rephrase.

MR. KESHAVARZ: You can read the question.

(Whereupon, the referred-to question was read back by the Reporter.)

THE WITNESS: Your question is still too broad.

BY MR. KESHAVARZ:

Q. In what way?

A. If I knew with absolute certainty that a judgment was vacated on a case, this income execution would've never come to me to be signed.

MR. FEINMAN: I'd just like my objection to run through, because he has not rephrased the question.

Q. My question was a little

R.J. FERRARO

different. You know, when you garnish someone's wages, that's pretty serious, right? These people live under wages, right?

MR. FEINMAN: Objection to form.

A. Yes.

Q. So if you take 10 percent of someone's wages over, what, 30 hours minimum wage, that could make a difference between someone paying their rent or paying their food or paying their hospital bills or not, right?

MR. FEINMAN: Objection to form.

A. Yes.

Q. All right. So before you take away someone's wages that they might need to pay their rent or groceries or medicine, if you saw on e-Courts that there was an order to show cause that was filed, would you take any other steps to determine whether the judgment has been executed, or would you just sign that income execution?

MR. FEINMAN: Objection to form.

A. If someone presented me with

R.J. FERRARO

information that someone filed a motion and a judgment was vacated, we would take an additional step to take a look and see what the results were.

Q. That wasn't my question.

MR. KESHAVARZ: Re-read my question, please.

(Whereupon, the referred-to question was read back by the Reporter.)

Q. Let me rephrase the question. Let me restate the question. It's a yes-or-no question.

MR. FEINMAN: Objection to form.

Q. Yes or no. Before you sign an income execution -- strike that.

Let me ask you a yes-or-no question. If you saw on e-Courts that there was an order to show cause filed to vacate the judgment, would you take any other steps to determine --

A. Yes.

Q. You have to wait until I finish the question.

R.J. FERRARO

If you saw on e-Courts that there was order to show cause to vacate a judgment, would you take any other steps to determine whether the judgment had been vacated before signing an income execution that could take away people's money that they need for their rent or food or medicine?

MR. FEINMAN: Objection to form.

A. Yes.

Q. What steps would you take?

MR. FEINMAN: Objection to form.

A. Well, again, I would probably -- the easiest way to do it would be to see when it was filed and when it was returnable. Perhaps, ask the colleague, because most of our colleagues do go to court, to see if they appeared on this case. Something like that would take place if someone presented me with this e-Courts and said, "An order to show cause to vacate a judgment has been filed."

Q. If you check to see the first page of Exhibit 4 and then you saw that there was

R.J. FERRARO

an order to show cause that was filed, by clicking through, would you -- strike that. Let's just take a break.

(Whereupon, a short recess was taken from 4:25 p.m. to 4:31 p.m.)

BY MR. KESHAVARZ:

Q. We talked about checking on e-Courts to determine whether there has been an order to show cause to vacate a judgment. Do you remember that testimony?

A. Yeah.

Q. And putting aside the issue of timing, you know, whether the order to show cause has been filed this month or last month. Put that issue aside for a second.

If an order to show cause had been filed, e-Courts would normally show that, at least, the order to show cause had been filed, right?

A. No.

Q. It wouldn't usually show that?

MR. FEINMAN: Objection.

MR. KESHAVARZ: Go ahead. You can answer.

Wait. Wait.

MR. FEINMAN: No, no. Excuse me. You have to let me get my objection out.

MR. KESHAVARZ: No. You say objection to form. You can't do anything beyond that.

MR. FEINMAN: Right. So when I go to object, you cannot hold up your finger and say "excuse me." You have to let me get my objection on the record.

MR. KESHAVARZ: Objection to form. Okay. Go ahead. You can answer the question.

Q. So my question is: Are you saying you're disputing that the vast majority of the time when someone files an order to show cause, that order to show cause filing would be reflected on e-Courts? Is that your sworn testimony?

MR. FEINMAN: Objection to form.

A. I'm saying that if someone were to file a motion, that it could be reflected on

R.J. FERRARO

e-Courts but it's not always the case.

Q. Let me ask you the other way around: The vast majority -- if you wanted to find out whether an order to show cause has been filed in a case, the first thing you would do is check e-Courts, right?

MR. FEINMAN: Objection to form.

A. There would be nothing that randomly would happen that would -- I mean, I don't just take random stock of e-Courts and say, "I wonder if there is a case where a judgment has been vacated on," and go to e-Courts.

Q. That wasn't my question. My question is: If you wanted to check to see if an order to show cause has been filed to vacate a judgment on a case, the first thing you would do is check on e-Courts, right?

MR. FEINMAN: Objection to form.

A. No.

Q. Really?

MR. FEINMAN: Objection to form.

Q. What would you do?

A. Well, first, I'd go to my case

R.J. FERRARO

file and see if we received a motion in the mail.

Q. What's the next thing you would do?

A. It depends on the results of that. If the motion had been received, I would take a look, find out if it was calendared and go from there. If the motion had not been received, then, perhaps, I would contact the court and see if it was actually filed and when it's scheduled for.

Q. Okay. You'd do all of that instead of checking on e-Courts, right?

MR. FEINMAN: Objection to form.

A. Probably.

Q. Why is that?

A. My responsibility is not to check e-Courts for every case. That's what the calendar person would do.

Q. Who is the calendar person?

A. The person that manages our calendar, updating when appearances are, who is going where, et cetera, et cetera.

It's not my responsibility to

R.J. FERRARO

randomly check e-Courts to see what's going on on every case we have in the office.

Q. That wasn't my question. My question is: If you're trying to find out whether there has been an order to show cause filed in the case, in any case, where you're signing an income execution, the first thing you would do is check e-Courts, right?

MR. FEINMAN: Objection to form.

A. No. We already went over that. I wouldn't check e-Courts first. I would check my file and see if we received anything. If we hadn't received anything, again, I would, perhaps, contact the court if there was information that there might've been a motion filed.

Q. Do you know if any of the income executions you're signing are to collect on judgments that were obtained by a firm other than Forster & Garbus?

A. If a judgment was obtained by another firm and they gave us the information that a judgment was entered and

R.J. FERRARO

valid in the case, then this income execution would come to my desk and I can sign it, because we haven't been given that information. If there has been a judgment, let's say, from another firm and that judgment was vacated and they knew about it and we knew about it, this would've never come to my desk.

Q. If that's your sworn testimony, it is.

MR. FEINMAN: Nothing further from me.

MR. KESHAVARZ: I appreciate your time.

(Whereupon, at 4:36 p.m., the examination of this witness was concluded.)

____
RONALD J. FERRARO

Subscribed and sworn to before me

this _____ day of ________________ 20___.

____
NOTARY PUBLIC

R.J. FERRARO

E X H I B I T S

PLAINTIFF(S) EXHIBITS:

EXHIBIT NUMBER	EXHIBIT DESCRIPTION	PAGE
1	Subpoena	6
2	LinkedIn résumé	18
3	Income Execution	30
4	e-Courts Web site printout for Mr. Callender	56

(Exhibits retained by Counsel.)

I N D E X

EXAMINATION BY	PAGE
MR. KESHAVARZ	4

INFORMATION AND/OR DOCUMENTS REQUESTED

N O N E

QUESTIONS MARKED FOR RULINGS

N O N E

R.J. FERRARO

C E R T I F I C A T E

STATE OF NEW YORK)
: SS.:
COUNTY OF KINGS)

I, ANNA VORTSMAN, a Notary Public for and within the State of New York, do hereby certify:

That the witness whose examination is hereinbefore set forth was duly sworn and that such examination is a true record of the testimony given by that witness.

I further certify that I am not related to any of the parties to this action by blood or by marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 4th day of November, 2016.

Anna Vortsman

ANNA VORTSMAN

'

'11 [1] 19/18

0

05813 [1] 1/6

1

10 percent [1] 66/8
103 [1] 4/11
11003 [1] 4/12
11241 [2] 1/18 2/5
11556 [1] 2/10
1400 [2] 22/2 22/13
15-CV-05813 [1] 1/6
16 [2] 1/17 2/5
17 million [1] 61/9
18 [1] 75/8
1st [1] 55/7

2

20 [1] 74/22
20-something [1] 33/7
2010 [1] 15/11
2011 [10] 14/13 15/12 15/18 16/19 17/18 25/7 35/6 35/15 40/14 46/20
2012 [1] 14/16
2014 [6] 31/22 34/24 35/6 35/17 36/21 46/19
2016 [9] 1/10 16/23 16/25 17/18 19/18 25/8 40/15 46/21 76/19
24 [1] 1/10
26th [2] 1/17 2/5
2nd [1] 4/12

3

30 [4] 3/15 44/15 66/9 75/9
30 seconds [1] 58/16
3:11 [1] 1/11
3rd [1] 46/18

4

47 [3] 57/19 58/9 58/24
4:25 [1] 69/6
4:31 [1] 69/6
4:36 [1] 74/16
4th [1] 76/19

5

50 [1] 21/16
56 [1] 75/10
5:00 [1] 21/4

6

62 [1] 61/7
65 [1] 21/16

7

700 [2] 22/2 22/12

9

926 [1] 2/10
9:00 [1] 21/4

A

able [3] 31/6 43/20 50/11
about [28] 5/14 13/2 13/3 13/9 14/25 15/2 15/11 21/23 24/19 30/5 30/5 30/7 32/13 32/25 37/18 38/14 39/16 41/8 42/23 44/8 44/15 45/13 49/2 52/15 62/12 69/8 74/7 74/8
absolute [1] 65/18
account [2] 42/16 45/16
accurate [12] 28/24 35/9 35/21 36/13 36/15 39/19 47/5 54/22 55/11 56/15 59/11 59/11
action [1] 76/15
actually [4] 49/21 54/21 55/8 72/11
additional [3] 37/25 52/16 67/4
address [2] 4/10 11/21
addressed [1] 47/2
adjourned [2] 24/6 33/8
adjournments [1] 26/9
administer [1] 3/10
admitted [2] 14/13 15/14
advance [1] 6/5
after [9] 3/15 14/19 14/23 14/25 15/17 15/18 16/18 34/7 36/20
afternoon [3] 27/25 33/8 33/9
again [14] 15/5 18/18 19/3 30/22 32/24 44/7 46/6 48/25 51/3 59/10 60/14 62/25 68/14 73/16
against [4] 1/5 8/16 8/22 12/18
ago [3] 62/16 63/8 64/5
AGREED [2] 3/4 3/19
agreement [1] 9/15
ahead [4] 45/7 53/2 69/24 70/15
Ahmad [3] 1/16 2/3 2/6
AKH [1] 1/6
all [20] 3/20 11/24 18/16 19/21 19/25 20/3 20/7 24/16 34/10 34/12 39/7 59/2 59/5 59/6 59/7 59/9 60/2 63/15 66/16 72/13
allegations [2] 12/21 13/15
allow [2] 47/18 47/18
almost [1] 41/9
already [5] 46/3 47/2 48/4 48/14 73/12
also [4] 2/14 22/18 26/23 27/10
always [7] 31/25 53/13 63/2 63/3 64/12 64/13 71/2
am [5] 36/2 36/2 46/10 76/14 76/16
AND/OR [1] 75/19
Anna [3] 1/18 76/7 76/22
ano [2] 1/7 2/9
another [3] 27/19 73/24 74/6
answer [17] 7/11 9/23 16/12 24/8 29/23 45/8 45/22 45/24 46/3 46/8 47/15 47/20 48/15 53/3 53/7 69/25 70/15
answered [1] 28/16
answering [2] 15/16 46/11
any [72] 8/6 8/11 8/13 8/19 8/20 8/24 9/5 9/8 9/9 9/18 10/6 10/10 12/5 12/21 12/23 14/6 16/24 17/20 18/10 20/14 21/15 21/19 22/2 22/13 23/9 23/18 24/10 24/20 28/5 29/14 30/9 30/13 32/8 37/2 37/9 38/5 38/7 38/10 40/18 42/9 42/17 43/3 43/11 44/20 44/21 45/2 45/10 45/15 48/17 48/21 48/22 48/23 50/14 50/16 51/8 51/18 51/18 51/24 52/3 52/6 52/10 52/15 52/19 53/22 57/25 65/4 66/21 67/21 68/4 73/7 73/19 76/15
anybody [1] 43/4
anyone [14] 3/10 4/21 4/25 5/5 5/7 5/11 5/22 6/20 10/12 11/5 11/8 41/10 42/25 54/14
anything [11] 13/7 22/20 43/21 44/4 45/12 50/7 51/2 51/14 70/8 73/15 73/15
anytime [1] 57/12
apologize [3] 6/5 6/8 39/22
appear [5] 16/17 24/8 57/6 60/16 64/23
appearance [3] 16/15 56/25 57/3
appearances [19] 15/25 16/7 22/19 23/7 23/11 23/24 24/13 24/21 24/24 26/13 26/15 27/20 28/5 28/19 56/12 59/2 59/5 59/6 72/23
appeared [5] 24/17 49/22 49/23 53/18 68/19
appears [3] 31/8 57/7 58/6
appreciate [1] 74/14
approximately [1] 15/9
April [4] 16/23 16/25 19/18 46/21
April 2016 [1] 46/21
are [29] 3/20 4/23 9/9 10/23 11/3 13/10 18/16 18/25 19/25 20/2 20/7 31/6 35/17 38/13 42/16 42/22 43/11 44/8 46/17 47/3 48/6 61/7 61/8 62/12 63/16 63/16 70/17 72/23 73/20
around [2] 27/13 71/4
Arthur [1] 19/8
as [50] 3/11 3/14 3/20 4/2 4/5 6/12 6/13 7/10 7/16 12/23 13/21 15/3 15/7 15/10 15/15 15/19 17/5 18/2 18/3 19/7 22/16 22/16 26/8 29/25 30/25 31/2 31/6 34/24 36/8 36/8 36/17 36/22 38/8 40/6 40/12 41/20 44/12 44/12 44/15 47/2 47/19 49/5 54/20 56/2 56/4 56/8 56/9 59/14 63/12 64/4
aside [2] 69/13 69/16
ask [26] 6/23 6/24 7/3 7/4 25/5 25/23 29/17 30/12 35/11 35/25 36/12 37/7 39/21 42/3 44/10 44/19 47/17 47/24 48/16 53/25 63/3 63/6 65/8 67/18 68/17 71/3
asked [5] 11/24 27/8 36/2 38/9 47/22
asking [15] 30/2 38/22 44/14 44/18 44/22 45/9 46/17 48/19 49/2 52/15 52/17 53/10 53/11 54/7 61/6
assigned [3] 22/17 23/16 27/5
associate [4] 17/16 19/14 20/2 20/7
assume [1] 7/5
assuming [2] 5/25 58/19
attempting [1] 29/15
attending [1] 7/17
attorney [17] 2/4 9/19 14/12 15/19 16/4 16/9 16/14 16/14 16/17 19/14 20/2 20/7 25/15 28/6 41/5 44/12 53/25
attorney-client [1] 9/19
attorneys [7] 2/9 4/22 4/23 27/5 35/25 54/10 54/14
August [5] 15/11 15/12 16/19 19/18 46/20
August 2010 [1] 15/11
August 2011 [2] 15/12 46/20
authenticate [4] 18/8 18/18 19/3 57/10
authorized [1] 3/10
available [1] 41/4
avoid [1] 38/5
away [4] 59/17 64/25 66/17 68/7

B

back [12] 10/4 26/20 28/2 28/19 33/10 33/20 42/3 46/15 49/25 50/4 65/12 67/10
balance [1] 39/6
balances [1] 35/2
bank [9] 8/15 29/20 32/13 32/15 32/19 32/23 38/25 41/13 58/2
banner [1] 57/13
bar [1] 14/23
Based [1] 50/21
basic [2] 15/16 28/25
basis [6] 26/6 30/23 47/25 51/4 54/15 60/4
be [51] 3/7 3/9 3/13 5/13 11/18 13/5 14/9 16/3 16/4 21/17 25/15 25/17 27/6 27/20 30/18 31/8 31/21 32/7 32/14 32/18 33/9 33/13 35/8 35/19 40/16 42/14 43/20 47/10 47/12 47/12 50/11 53/14 55/7 57/6 57/8 57/13 58/6 59/20 59/25 60/2 60/9 61/13 61/22 62/2 62/18 64/20 65/21 68/15 70/21 70/25 71/9
because [12] 13/20 18/8 27/9 34/7 45/18 57/10 59/20 60/18 63/11 65/23 68/18 74/4
been [54] 4/3 7/15 14/6 14/11 18/10 31/5 32/4 35/4 40/14 40/15 40/20 40/24 41/11 41/16 41/22 42/10

B

been... [38] 42/18 43/13 44/6 45/5 47/2 49/10 50/8 50/17 51/10 51/21 52/12 52/21 54/17 55/22 58/22 59/10 62/21 62/25 63/8 63/13 63/14 64/16 66/22 68/5 68/23 69/9 69/15 69/17 69/19 71/6 71/13 71/17 72/7 72/10 73/6 73/18 74/4 74/5
before [14] 1/18 3/10 3/12 6/18 6/21 36/19 38/8 47/14 51/19 65/4 66/16 67/16 68/6 74/21
began [2] 16/19 17/18
behalf [2] 24/8 24/13
being [4] 4/17 34/7 36/2 51/6
believe [5] 11/7 11/20 13/25 37/6 57/2
below [2] 19/13 19/22
beneath [1] 19/25
better [4] 17/2 34/9 34/10 37/13
between [9] 3/5 8/25 11/4 17/21 21/16 22/2 22/12 59/21 66/10
beyond [1] 70/8
Biancanello [2] 15/4 15/6
bills [1] 66/12
bit [1] 6/6
blood [1] 76/16
book [1] 15/23
boroughs [4] 27/17 56/15 60/22 62/17
bottom [2] 20/3 31/11
boy [1] 15/8
break [2] 63/12 69/4
broad [3] 29/25 52/4 65/15
Bronx [3] 27/8 56/14 63/15
Brooklyn [3] 1/18 2/5 63/14
brought [1] 8/6
business [3] 15/23 37/19 49/18

C

calendar [7] 24/5 33/6 49/24 63/18 72/20 72/21 72/23
calendared [1] 72/8
calendars [1] 26/8
called [3] 4/2 26/15 63/18
CALLENDER [14] 1/3 2/4 8/16 8/22 12/15 12/18 42/24 43/3 43/24 45/13 49/2 57/7 57/19 75/10
Callender's [1] 45/16
Callender-47 [1] 57/19
calls [1] 28/5
came [5] 23/17 28/19 49/5 49/9 49/25
can [32] 6/9 9/22 9/24 9/25 10/18 10/20 16/12 19/5 23/22 29/18 29/23 34/16 35/11 45/7 45/22 46/3 46/8 46/12 47/11 52/5 52/9 52/19 53/2 53/7 53/23 54/2 56/18 64/22 65/9 69/24 70/15 74/3
can't [13] 12/8 16/17 18/8 18/18 19/3 42/16 47/12 50/3 52/2 57/10 58/13 61/2 70/7
cannot [2] 53/12 70/10
capable [4] 36/7 36/8 36/10 36/11
careful [1] 5/13
case [39] 1/5 24/4 28/14 30/16 30/23 30/23 41/9 43/21 43/23 45/10 45/11 48/22 48/24 49/4 49/16 50/25 51/4 51/4 51/16 52/3 52/16 53/12 53/24 54/2 54/23 55/24 63/6 65/19 68/19 71/2 71/6 71/12 71/18 71/25 72/19 73/3 73/7 73/7 74/2
case-by-case [2] 30/23 51/4
caseload [3] 21/24 22/9 22/10
cases [15] 22/17 23/16 23/17 24/6 24/9 25/12 26/6 27/12 27/13 28/10 28/12 33/7 53/16 55/5 61/11
cause [27] 49/20 50/3 53/19 53/21 58/23 60/11 62/15 62/20 63/7 64/3 64/5 64/16 65/3 66/20 67/20 68/3 68/22 69/2 69/10 69/15 69/17 69/19 70/20 70/20 71/5 71/17 73/7
certain [2] 24/19 42/16
certainty [2] 64/22 65/18
certification [1] 3/7
certify [2] 76/9 76/14
cetera [2] 72/24 72/24
change [12] 17/20 25/6 33/2 36/20 36/22 37/2 37/5 37/9 39/15 39/24 39/25 40/7
changed [8] 17/17 25/9 25/24 26/25 31/25 32/7 39/18 40/6
changes [1] 18/10
check [14] 41/11 50/7 54/15 54/22 55/14 68/24 71/7 71/16 71/19 72/18 73/2 73/9 73/13 73/14
checked [3] 38/19 40/22 52/11
checking [6] 40/13 40/19 41/8 55/19 69/8 72/14
checks [4] 35/2 37/13 38/5 50/12
circles [1] 63/11
City [12] 22/11 27/14 56/14 56/23 60/19 60/20 60/25 61/4 61/19 62/16 63/7 64/2
Civil [1] 1/15
claims [1] 13/10
clear [1] 48/25
clerical [1] 15/16
clerk [3] 17/5 19/8 55/4
clerks [1] 59/16
click [2] 58/25 59/8
clicking [1] 69/3
client [4] 9/19 50/24 51/6 52/17
colleague [2] 49/22 68/17
colleagues [1] 68/18
collect [7] 29/15 29/19 29/25 30/2 30/3 30/18 73/20
collecting [2] 30/10 40/24
collection [3] 15/22 16/3 30/14
color [1] 57/16
come [5] 26/20 33/13 65/20 74/3 74/9
coming [1] 53/21
common [1] 41/3
communications [1] 8/25
completed [2] 35/8 35/20
complicated [1] 25/11
computer [11] 33/8 33/14 34/9 34/15 34/25 36/6 37/19 38/15 39/11 39/15 39/24
computer-generated [1] 33/14
concluded [1] 74/18
conference [1] 24/5
conferences [1] 24/6
confirm [1] 54/3
considered [1] 27/10
contact [2] 72/11 73/16
contains [1] 39/4
contents [3] 10/19 18/25 20/15
control [3] 8/14 8/20 10/9
copy [5] 3/13 3/16 7/20 8/17 18/6
correct [17] 12/12 18/23 19/9 26/4 29/21 31/15 40/25 41/23 43/24 43/25 45/16 45/17 47/10 56/20 58/5 58/9 59/23
cough [1] 6/6
could [15] 11/18 12/2 13/22 15/25 16/3 25/21 36/9 37/25 38/12 42/2 59/25 60/2 66/10 68/7 70/25
could've [1] 57/25
counsel [6] 3/5 3/16 7/9 10/17 10/19 75/12
counties [3] 24/15 24/17 61/7
County [2] 17/11 76/5
couple [1] 59/21
course [4] 7/8 46/20 48/12 49/3
court [31] 1/2 1/17 2/5 3/12 17/11 21/25 22/19 23/7 23/11 23/24 26/12 26/15 26/17 26/20 26/21 27/20 28/19 28/20 31/18 41/5 45/21 47/2 48/4 49/22 49/23 53/18 56/12 56/25 68/19 72/11 73/16
court's [3] 44/13 47/20 48/4
courts [49] 21/25 22/12 24/20 25/23 40/19 40/23 41/5 41/8 54/9 54/15 54/22 55/11 55/14 55/20 55/25 56/6 56/18 56/20 56/24 57/6 57/12 57/21 59/22 60/3 60/10 60/16 62/18 63/9 63/19 64/7 65/2 66/19 67/19 68/2 68/21 69/9 69/18 70/21 71/2 71/7 71/11 71/14 71/19 72/14 72/19 73/2 73/9 73/13 75/10
custody [3] 8/14 8/20 10/9
CV [1] 1/6

D

daily [3] 23/7 23/11 23/23
date [11] 1/10 6/13 18/3 31/2 31/24 32/5 35/15 39/6 41/6 48/11 56/9
day [11] 21/10 26/6 26/6 26/13 28/3 28/8 30/6 55/4 58/20 74/22 76/19
day's [3] 28/4 28/21 30/6
day-to-day [1] 26/6
days [3] 3/15 26/14 27/21
dealing [1] 25/14
DeBellis [2] 31/14 31/20
debt [3] 15/22 16/3 30/2
debts [1] 53/17
December [5] 34/24 35/16 36/21 46/18 55/7
December 2014 [1] 34/24
December 3rd [1] 46/18
decision [1] 55/10
defendant [4] 1/8 49/25 53/16 64/11
Defendants [1] 2/9
Dennis [2] 15/4 15/7
depend [4] 30/15 51/3 51/15 51/16
depended [3] 21/10 32/24 60/14
depending [3] 41/6 53/25 56/22
depends [7] 25/3 26/23 52/3 55/3 55/4 55/4 72/6
deposed [1] 6/20
deposition [23] 1/13 3/7 3/8 3/13 4/20 5/19 5/24 6/17 6/18 7/9 7/18 7/21 7/21 8/4 8/8 9/6 9/11 10/13 10/22 11/6 11/12 20/10 20/15
DESCRIPTION [1] 75/6
desk [3] 41/18 74/3 74/9
determination [1] 47/11
determine [17] 40/23 42/10 42/18 43/13 44/4 44/21 45/3 48/18 50/16 51/9 51/20 52/20 54/16 66/21 67/22 68/5 69/9
determining [1] 41/21
Diamond [3] 17/8 17/9 19/9
did [43] 5/9 7/20 9/15 14/17 14/19 15/13 16/7 16/18 16/21 17/4 17/20 20/10 20/18 21/23 23/9 25/5 26/10 26/19 26/20 27/9 27/9 28/12 28/18 29/4 29/7 30/13 33/2 36/20 36/22 37/2 37/5 37/6 37/7 37/9 37/20 40/7 40/18 42/17 42/24 43/3 44/3 45/2 50/15
didn't [10] 5/10 18/9 20/20 26/11 26/14 27/11 32/22 49/20 57/11 63/3
diem [4] 15/25 16/4 16/8 16/14
difference [3] 25/17 38/15 66/10
different [5] 40/13 40/16 43/4 63/17 66/2
differently [2] 42/25 63/16
difficult [1] 25/12
digits [3] 58/14 58/16 58/18

D

Discover [3] 8/15 8/21 58/2
discuss [2] 24/9 24/11
discussed [1] 38/8
discussing [1] 25/4
disputing [1] 70/18
district [4] 1/2 1/2 21/25 22/12
do [64] 7/13 8/19 8/24 9/9 9/18 11/16 13/13 13/18 13/24 14/19 15/13 15/22 16/18 17/12 20/14 22/15 22/20 24/16 24/20 24/23 26/10 26/12 27/13 27/24 29/10 30/18 34/6 34/11 34/12 34/23 40/16 44/4 44/12 45/2 45/13 47/24 48/16 48/20 48/23 50/7 51/13 51/17 51/23 54/5 54/8 54/11 54/13 54/19 54/19 55/19 57/15 68/15 68/18 69/11 70/7 71/7 71/19 71/24 72/5 72/13 72/20 73/9 73/19 76/8
document [6] 17/25 18/13 18/19 30/24 31/7 56/7
documents [13] 8/3 8/6 8/11 8/13 8/19 8/24 9/5 9/8 9/10 9/18 10/7 29/14 75/19
does [12] 15/22 15/24 18/11 18/19 41/10 44/20 50/6 51/8 54/9 54/14 55/13 57/5
doesn't [5] 42/9 45/23 59/17 64/12 64/13
doing [1] 15/15
don't [35] 6/24 7/4 8/11 8/13 10/6 10/18 11/13 11/15 11/18 12/11 12/23 13/12 14/3 15/24 17/23 18/10 22/23 22/24 25/9 25/20 28/14 29/9 37/6 38/11 44/9 45/12 45/15 53/9 53/9 54/6 57/14 61/3 61/10 62/4 71/11
done [4] 18/14 19/23 27/18 61/15
down [3] 60/17 63/5 63/12
duly [2] 4/3 76/11
during [5] 7/8 25/6 25/24 30/5 49/7

E

e-Courts [44] 40/19 40/23 41/5 41/8 54/9 54/15 54/22 55/11 55/14 55/20 55/25 56/6 56/18 56/20 57/6 57/12 57/21 59/22 60/3 60/10 60/16 62/18 63/9 63/19 64/7 65/2 66/19 67/19 68/2 68/21 69/9 69/18 70/21 71/2 71/7 71/11 71/14 71/19 72/14 72/19 73/2 73/9 73/13 75/10
e-mail [3] 11/19 11/21 12/6
e-mailed [3] 10/12 10/21 11/5
e-mails [7] 9/13 9/14 10/24 11/4 11/10 12/5 12/10
each [1] 40/17
earlier [7] 11/21 12/3 12/6 36/17 40/12 54/20 59/14
easiest [1] 68/15
effect [2] 3/11 3/14
efficiency [1] 26/7
efficient [1] 38/19
eight [1] 40/15
either [3] 32/3 41/12 58/25
Elmont [1] 4/12
else [15] 4/25 5/5 5/7 11/5 11/8 13/7 22/20 33/11 33/18 33/24 42/25 43/4 51/2 51/14 54/14
elsewhere [1] 17/3
employer [1] 39/2
employment [1] 48/12
enough [3] 36/7 41/4 49/24
entered [2] 39/7 73/25
entire [1] 39/23
equation [1] 55/18
errand [1] 41/9
ESQ [2] 2/6 2/11
et [4] 1/7 2/9 72/24 72/24
even [1] 41/6
ever [4] 6/17 6/20 14/6 55/19
every [3] 26/13 72/19 73/3
exact [1] 12/24
exactly [1] 22/23
examination [5] 4/13 74/17 75/15 76/10 76/12
examined [1] 4/5
example [4] 33/5 37/16 49/14 53/15
examples [1] 53/22
except [1] 3/20
exchanged [1] 11/11
excuse [3] 28/11 70/3 70/11
executed [1] 66/22
executing [5] 35/7 39/18 40/2 40/8 54/16
execution [36] 31/9 33/14 33/23 34/2 34/15 35/9 35/16 35/20 36/19 37/9 39/4 41/12 41/17 41/22 42/8 42/20 43/15 48/20 49/17 50/9 50/18 51/11 51/20 52/7 52/13 52/22 55/20 62/13 65/6 65/20 66/23 67/17 68/6 73/8 74/3 75/9
executions [32] 29/4 29/12 29/13 29/16 31/22 32/7 32/10 32/18 36/14 41/19 42/7 43/11 44/3 44/6 44/23 45/3 45/19 46/25 47/3 47/23 47/24 48/6 48/10 48/14 49/9 54/10 55/15 60/19 60/22 60/23 61/18 73/20
Exhibit [17] 6/12 7/16 18/2 18/17 18/23 18/25 30/25 31/6 35/16 41/20 42/8 56/8 57/5 58/8 68/25 75/5 75/5
Exhibit 1 [1] 7/16
Exhibit 2 [3] 18/17 18/23 18/25
Exhibit 3 [4] 31/6 35/16 41/20 42/8
Exhibit 4 [2] 58/8 68/25
EXHIBITS [2] 75/4 75/12
expanding [1] 38/5
experience [2] 59/10 62/23
explanation [1] 22/25
extent [5] 10/16 11/22 25/24 26/25 62/11

F

fact [1] 55/22
fair [1] 7/7
far [1] 22/16
FDCPA [2] 13/5 13/10
February [1] 55/9
federal [5] 1/15 12/14 12/22 13/2 13/15
feel [1] 26/11
FEINMAN [7] 2/11 5/4 10/23 10/25 11/11 11/20 12/7
FERRARO [9] 1/14 4/8 4/15 4/17 14/5 14/7 14/10 18/6 74/20
few [1] 6/16
figure [1] 30/8
file [5] 29/7 54/3 70/25 72/2 73/14
filed [23] 55/6 62/16 62/21 63/8 64/5 64/11 64/12 64/16 64/21 66/20 67/2 67/20 68/16 68/23 69/2 69/15 69/18 69/20 71/6 71/17 72/12 73/7 73/18
files [1] 70/19
filing [2] 3/6 70/20
find [3] 71/5 72/8 73/5
fine [2] 44/17 54/7
finger [1] 70/11
finish [1] 67/24
firm [8] 12/19 13/21 16/5 24/8 24/14 73/21 73/24 74/6
first [13] 4/3 15/6 26/5 27/3 31/11 35/23 57/18 68/24 71/6 71/18 71/25 73/9 73/13
fits [1] 44/14
five [5] 24/7 27/16 49/3 60/22 62/16
floater [1] 27/11
Floor [3] 1/17 2/5 4/12
following [3] 17/25 30/24 56/7
follows [1] 4/5
food [2] 66/12 68/8
fool's [1] 41/9
force [1] 3/14
form [83]
format [1] 57/23
FORSTER [51] 1/7 2/9 9/2 9/5 12/15 16/20 16/25 17/15 19/14 19/17 20/18 20/21 20/25 21/8 21/13 23/6 23/10 23/19 25/18 25/25 28/18 28/25 29/5 30/20 35/14 37/8 37/10 39/17 40/2 40/22 41/10 42/6 42/9 43/12 44/3 44/20 45/2 48/18 49/8 50/6 50/15 51/8 51/19 52/6 52/10 54/8 54/13 55/13 60/4 60/24 73/22
forth [1] 76/11
found [1] 49/17
four [1] 24/7
Franklin [1] 4/11
full [4] 14/4 15/11 15/15 21/2
full-time [3] 15/11 15/15 21/2
further [4] 3/19 35/4 74/12 76/14

G

GARBUS [50] 1/7 2/9 9/2 9/6 12/15 16/20 16/25 17/15 19/14 19/18 20/19 20/22 20/25 21/8 21/13 23/6 23/10 23/19 25/19 25/25 28/18 29/2 29/5 30/20 35/15 37/8 37/10 40/2 40/22 41/10 42/6 42/9 43/12 44/4 44/20 45/2 48/18 49/8 50/7 50/15 51/8 51/19 52/6 52/11 54/9 54/13 55/13 60/5 60/24 73/22
Garbus' [1] 39/18
garnish [1] 66/2
garnishing [3] 34/18 35/18 43/2
garnishments [1] 29/11
gave [1] 73/24
generality [1] 63/12
generally [7] 12/25 26/22 30/17 32/8 32/14 32/18 57/3
generated [3] 33/9 33/14 34/15
get [10] 24/6 28/2 30/4 33/10 38/12 41/16 49/21 50/23 70/4 70/12
gets [3] 16/15 59/16 59/22
getting [2] 36/2 37/13
give [7] 33/18 33/20 35/8 35/19 49/13 52/2 53/19
given [7] 21/15 21/19 22/3 22/13 25/10 74/4 76/13
giving [3] 11/21 33/24 51/19
go [23] 7/25 14/17 17/4 20/6 20/20 24/7 24/12 25/24 26/12 26/19 27/4 27/5 27/8 45/7 52/24 53/2 68/18 69/24 70/9 70/15 71/13 71/25 72/9
goes [1] 48/2
going [19] 6/5 9/21 16/10 24/11 27/6 29/17 33/10 35/11 39/21 42/3 46/5 46/24 62/2 63/11 64/19 64/24 65/8 72/24 73/2
gone [1] 61/25
Good [1] 17/13
got [6] 7/24 15/14 28/21 33/7 38/18 49/19
graduated [1] 14/20
groceries [1] 66/18
ground [1] 6/16
guess [13] 11/15 13/5 13/20 26/22 27/10 36/6 36/9 37/16 61/6 61/13 61/22 62/2 62/3

H

had [38] 6/17 15/23 17/2 18/20 22/16 30/9 32/2 33/5 36/6 38/20 40/12 40/20

H
had... [26] 40/24 41/15 42/10 43/13 44/6 45/4 49/10 50/17 51/21 52/6 52/11 52/12 52/20 53/14 53/16 53/16 53/17 54/23 55/24 58/4 63/8 68/5 69/17 69/19 72/7 72/9
hadn't [1] 73/15
hand [1] 76/19
handed [1] 36/14
handing [1] 33/22
handle [1] 25/11
handled [2] 53/24 56/13
handling [2] 23/7 23/12
hands [1] 34/14
happen [1] 71/10
happened [1] 28/20
happens [1] 59/22
has [28] 5/11 5/22 17/17 18/10 41/11 41/22 42/18 46/25 48/4 50/8 51/10 54/17 54/23 58/22 59/10 62/20 62/25 64/16 65/24 66/22 68/23 69/9 69/15 71/6 71/13 71/17 73/6 74/5
have [54] 4/21 5/18 5/19 5/20 5/21 6/17 6/20 8/6 8/11 8/13 8/17 8/19 8/24 9/9 9/18 10/6 10/12 10/21 11/5 11/10 12/23 13/22 13/24 14/6 14/11 18/12 20/14 23/9 23/11 27/11 30/13 31/17 37/19 45/15 45/24 46/19 48/16 48/21 51/15 51/17 51/23 54/14 58/3 59/14 60/21 61/10 61/17 61/19 61/23 67/24 70/4 70/11 73/3 76/18
haven't [1] 74/4
having [5] 4/3 23/15 41/16 52/12 54/10
he [10] 15/22 15/23 15/24 16/6 44/15 45/23 46/2 46/6 48/14 65/23
he's [2] 6/3 52/25
hearing [1] 30/7
hearings [1] 28/22
heart [1] 48/3
held [1] 1/16
help [2] 13/23 13/25
here [14] 4/18 5/14 13/18 18/11 19/4 44/15 51/17 51/23 52/5 52/9 52/19 52/25 57/13 57/14
hereby [2] 3/4 76/8
herein [1] 3/6
hereinbefore [1] 76/11
hereunto [1] 76/18
him [4] 11/4 15/10 15/21 47/19
hired [3] 16/15 27/3 27/4
his [2] 15/6 16/5
hit [4] 38/12 56/19 59/4 59/7
hits [1] 58/3
hmm [1] 31/16
hold [1] 70/10
holiday [1] 26/17
Honorable [1] 19/8
hope [2] 59/5 59/8
hospital [1] 66/12
hours [9] 20/21 20/24 21/4 21/7 21/12 21/16 21/18 26/21 66/9
how [16] 11/10 12/11 14/11 16/21 17/12 27/21 29/25 30/2 30/3 33/12 36/2 38/12 47/24 48/9 58/11 58/14
hypothetically [1] 58/4

I
I'd [5] 27/8 28/3 61/25 65/22 71/25
I'll [2] 47/18 49/13
I'm [30] 5/25 6/5 9/21 11/3 13/20 16/10 28/13 29/17 30/4 30/8 31/5 35/11 38/22 39/21 44/7 44/11 44/14 44/17 46/5 46/24 48/3 48/25 52/24 53/9 54/7 55/17 59/7 62/2 65/8 70/24
I've [4] 24/17 27/18 55/5 63/23
idea [6] 13/21 30/4 61/11 61/17 61/20 61/23
identification [4] 6/13 18/3 31/2 56/9
identify [3] 10/18 10/20 31/7
improvements [1] 39/11
inaccurate [2] 41/6 59/19
inception [2] 22/3 22/14
included [1] 23/15
includes [1] 10/17
including [1] 42/7
income [70] 29/4 29/12 29/13 29/16 31/8 31/22 32/7 32/9 32/18 33/14 33/23 34/2 34/14 35/9 35/16 35/20 36/14 36/18 37/9 39/4 40/3 40/9 41/12 41/17 41/19 41/22 42/7 42/8 42/19 43/10 43/14 44/3 44/5 44/23 45/3 45/19 46/25 47/3 47/23 47/24 48/5 48/10 48/13 48/20 49/9 49/17 50/9 50/18 51/11 51/20 52/7 52/13 52/21 54/10 55/15 55/20 60/19 60/21 60/23 61/18 62/13 65/5 65/20 66/23 67/17 68/6 73/8 73/19 74/2 75/9
independent [2] 37/20 37/22
index [4] 56/19 57/20 58/4 58/12
indicated [5] 34/24 40/12 54/20 59/14 63/23
indicating [1] 57/14
information [17] 13/22 13/24 29/7 29/20 37/18 39/5 39/8 41/4 41/8 50/24 58/5 59/18 67/2 73/17 73/25 74/5 75/19
informed [1] 51/6
initial [2] 14/8 38/11
injury [1] 16/2
instead [4] 25/14 37/17 49/21 72/14
instructed [1] 7/11
instructing [2] 47/14 47/19
interested [1] 76/17
Internet [1] 58/19
interruptions [1] 58/19
involve [1] 40/19
involved [1] 41/20
involvement [7] 13/14 30/9 30/13 33/25 34/17 35/18 36/18
is [107]
Island [1] 63/13
isn't [2] 62/23 63/9
issue [3] 48/6 69/13 69/16
issues [3] 24/11 38/6 38/7
issuing [3] 33/25 37/8 41/12
it [121]
it'd [1] 25/15
it'll [2] 56/19 64/10
it's [31] 6/7 7/7 11/16 12/17 18/9 21/8 26/7 35/24 36/7 36/8 38/24 41/3 41/9 42/3 52/4 54/16 55/17 59/10 59/12 59/19 60/15 62/4 62/25 63/13 63/21 63/23 64/2 67/13 71/2 72/12 72/25
its [3] 37/20 54/10 54/14

J
James [2] 14/5 14/7
January [2] 14/13 15/18
January 2011 [2] 14/13 15/18
Jersey [1] 14/15
JESSICA [1] 2/15
job [1] 17/2
Joe [2] 20/11 20/15
John [1] 38/12
judge [7] 3/12 17/6 17/7 17/8 17/9 17/9 55/10
judges' [1] 63/17
judgment [49] 29/19 30/3 39/6 39/7 40/20 40/23 41/11 41/15 41/21 42/10 42/15 42/18 43/13 48/19 49/5 49/10 50/8 50/17 50/19 50/25 51/7 51/9 51/21 52/11 52/20 54/4 54/16 54/23 55/21 55/24 56/2 60/8 60/11 64/3 65/3 65/19 66/22 67/3 67/21 68/4 68/5 68/23 69/10 71/13 71/18 73/23 73/25 74/5 74/7
judgments [8] 29/15 30/10 30/14 30/18 44/5 44/22 45/4 73/21
jury [1] 16/8
just [34] 4/22 6/2 8/17 12/8 14/8 20/20 23/2 25/22 27/12 28/15 29/19 30/4 30/8 30/12 36/12 36/13 36/18 38/22 42/3 42/5 44/12 44/18 47/15 53/9 53/11 53/12 54/7 56/18 56/18 63/6 65/22 66/23 69/4 71/11

K
Keshavarz [5] 1/17 2/3 2/6 4/14 75/16
KINGS [1] 76/5
knew [7] 52/10 53/17 55/6 64/25 65/18 74/7 74/8
know [43] 8/2 10/23 11/13 11/16 13/12 13/13 13/18 14/3 15/23 15/24 18/10 18/14 19/23 22/24 24/16 35/25 36/6 36/7 38/2 38/8 44/18 47/24 50/23 51/14 53/8 53/8 53/9 53/9 54/5 54/7 54/8 54/8 54/11 54/13 54/19 54/19 58/20 61/3 61/8 62/4 66/2 69/14 73/19
knowledge [34] 5/11 5/22 12/23 20/14 37/3 37/6 37/12 39/9 39/17 40/18 40/21 41/3 41/15 43/11 44/2 44/20 44/25 48/17 48/21 49/13 50/6 50/10 50/15 50/22 51/5 51/8 51/13 51/18 51/24 52/3 52/18 54/6 55/12 57/11
known [2] 14/6 38/10

L
lag [2] 59/20 59/25
last [4] 7/25 10/25 15/7 69/15
Lastorino [3] 5/6 11/7 11/11
later [2] 24/19 49/10
law [5] 1/16 2/3 14/20 17/5 19/8
lawsuit [12] 8/15 8/21 9/3 9/3 12/14 12/18 12/22 12/24 13/3 13/6 13/10 13/15
lay [1] 23/2
least [2] 50/23 69/19
left [4] 16/25 17/18 26/7 38/18
legal [1] 14/4
Leiderman [2] 20/11 20/16
less [2] 26/9 58/15
let [22] 7/15 8/2 18/14 19/23 23/2 25/5 30/12 35/13 36/12 37/7 42/5 44/19 47/23 48/16 54/11 63/6 67/12 67/12 67/18 70/4 70/12 71/3
let's [10] 5/13 33/5 37/20 49/16 53/15 60/17 62/12 62/15 69/4 74/6
letting [1] 52/24
levels [4] 38/20 38/23 38/23 40/13
light [2] 47/20 49/10
like [9] 17/12 19/6 26/11 26/17 35/24 50/5 58/7 65/22 68/20
likely [3] 34/5 64/10 64/22
line [2] 19/5 22/8
LinkedIn [4] 18/7 18/12 18/20 75/8
list [1] 8/3
litigation [2] 48/7 54/3
little [2] 52/25 65/25
live [2] 38/3 66/4
living [1] 61/9
LLP [4] 1/7 2/8 2/9 19/14
location [2] 8/21 10/10
locations [1] 38/2
long [5] 14/11 16/21 36/7 58/11 64/4
longer [1] 13/21
look [8] 18/11 18/19 50/2 54/2 55/5 58/7 67/4 72/8
looked [1] 7/23

L
looking [4] 22/25 57/18 59/4 59/7
M
made [4] 16/6 28/19 39/25 55/10
mail [4] 11/19 11/21 12/6 72/3
mailed [3] 10/12 10/21 11/5
mailing [1] 33/21
mails [7] 9/13 9/14 10/24 11/4 11/10 12/5 12/10
main [2] 23/9 25/17
major [3] 23/5 23/18 38/15
majority [6] 56/13 60/9 61/18 62/17 70/18 71/4
make [8] 6/2 7/9 16/7 16/15 24/13 26/15 38/24 66/10
making [1] 22/19
manage [3] 21/24 22/10 22/18
manages [1] 72/22
managing [1] 22/8
Manhattan [2] 33/6 63/14
many [7] 11/10 12/11 38/12 47/24 53/16 58/3 58/14
marked [7] 6/12 7/15 18/2 30/25 31/5 56/8 75/23
markings [1] 63/17
marriage [1] 76/16
matter [3] 25/16 26/7 76/17
matters [5] 21/24 22/2 22/10 22/13 25/11
MATTHEW [1] 2/11
may [4] 3/9 3/13 40/16 57/4
maybe [7] 6/9 24/9 25/10 28/13 47/16 53/20 54/2
me [49] 6/24 7/4 7/5 7/15 8/2 8/18 9/9 10/19 11/20 11/21 18/14 19/23 20/18 21/23 23/2 23/23 25/5 28/11 30/12 34/14 35/13 36/12 36/19 37/7 38/9 42/5 44/10 44/19 47/23 48/16 52/15 54/11 59/6 59/9 61/6 63/6 65/20 66/25 67/12 67/13 67/18 68/21 70/3 70/4 70/11 70/12 71/3 74/13 74/21
mean [17] 17/23 21/2 22/15 22/20 23/23 28/13 28/14 29/18 29/24 34/23 38/16 38/23 39/3 43/23 48/23 56/23 71/10
means [1] 24/4
medicine [2] 66/18 68/9
method [1] 39/15
middle [2] 14/9 38/11
might [5] 7/9 13/22 13/25 59/20 66/17
might've [3] 40/14 40/15 73/17
million [1] 61/9
mine [1] 49/23
minimum [1] 66/9
misstating [1] 28/13
Mm [1] 31/16
Mm-hmm [1] 31/16
money [1] 68/7
monopolize [1] 27/22
month [2] 69/15 69/16
months [3] 59/21 63/8 64/5
MOODY [1] 2/15
more [15] 11/14 11/16 24/21 25/11 25/11 26/6 37/13 38/18 38/19 38/20 38/20 38/22 38/23 63/8 64/5
morning [2] 27/23 33/7
most [16] 16/6 27/21 34/4 35/24 35/25 56/12 60/23 61/3 61/11 62/4 63/25 64/3 64/6 64/10 64/22 68/18
mostly [1] 60/18
motion [13] 24/10 55/6 56/3 64/2 64/11 64/21 67/2 70/25 72/2 72/7 72/9 73/18
motions [3] 58/25 59/8 59/9
MR [5] 4/14 4/17 18/6 75/10 75/16
Mr. [16] 5/4 8/16 8/22 10/23 10/25 11/11 11/20 12/7 12/18 42/24 43/3 43/24 45/13 45/16 49/2 57/7
Mr. Callender [9] 8/16 8/22 12/18 42/24 43/3 43/24 45/13 49/2 57/7
Mr. Callender's [1] 45/16
Mr. Feinman [6] 5/4 10/23 10/25 11/11 11/20 12/7
Ms [1] 11/7
Ms. [3] 5/6 11/11 31/20
Ms. DeBellis [1] 31/20
Ms. Lastorino [2] 5/6 11/11
much [5] 26/11 28/7 38/18 38/19 48/9
multiple [1] 53/17
my [56] 4/22 8/12 10/7 11/25 12/17 12/18 13/5 13/20 14/8 14/9 18/12 18/20 18/22 23/16 24/12 25/9 28/3 36/18 36/22 37/5 37/5 37/12 37/24 38/4 40/21 41/17 44/12 47/16 48/12 49/3 49/13 57/11 58/19 59/10 62/25 63/4 63/20 63/22 65/22 65/25 67/6 67/7 70/4 70/12 70/17 71/15 71/15 71/25 72/18 72/25 73/4 73/4 73/14 74/3 74/9 76/19
myself [3] 11/4 28/4 32/3
N
nail [1] 60/17
name [10] 4/7 14/4 14/7 14/9 15/6 15/7 31/13 31/14 38/9 39/5
named [1] 16/16
names [1] 38/10
narrow [1] 63/4
Nassau [1] 17/11
natural [1] 35/24
nature [2] 12/14 12/24
navigate [1] 47/15
necessarily [1] 56/2
necessary [1] 35/5
need [3] 24/16 66/17 68/8
needed [2] 34/11 34/12
needs [1] 24/7
never [9] 40/21 40/22 41/16 56/5 59/10 59/11 59/18 65/20 74/8
NEW [26] 1/2 1/18 1/20 2/5 2/10 4/4 4/12 14/15 14/15 21/24 22/11 27/13 56/14 56/23 57/12 60/18 60/19 60/24 61/4 61/9 61/19 62/16 63/7 63/25 76/4 76/8
next [7] 19/22 20/6 28/4 28/21 30/6 31/14 72/4
night [1] 7/23
no [47] 1/5 5/15 6/22 8/9 8/23 9/4 9/7 9/12 9/13 9/14 9/17 10/6 11/9 13/8 13/17 13/21 17/19 20/13 20/17 21/6 31/17 35/4 36/25 43/9 45/14 46/2 48/22 57/3 57/5 58/19 60/7 60/10 61/10 61/17 61/20 61/23 62/7 67/13 67/16 67/18 69/21 70/3 70/3 70/6 71/21 73/12 76/16
Non [1] 1/13
Non-Party [1] 1/13
Nope [3] 5/2 5/8 6/19
normal [1] 21/17
normally [1] 69/18
not [49] 5/15 5/18 5/19 5/21 8/10 18/9 22/7 22/17 23/22 36/8 36/11 40/21 41/4 41/20 44/7 44/14 44/15 45/5 47/4 47/14 47/19 48/6 48/25 49/6 49/13 51/14 54/6 54/9 54/14 54/19 54/22 55/11 55/14 57/4 59/12 59/13 60/2 62/2 62/5 63/2 63/13 63/19 65/24 66/12 71/2 72/9 72/18 72/25 76/14
Notary [4] 1/19 4/4 74/24 76/7
note [1] 42/22
notes [1] 28/3
nothing [3] 10/11 71/9 74/12
November [2] 14/16 76/19
November 2012 [1] 14/16
now [1] 38/14
number [9] 45/25 46/25 47/3 48/5 56/19 57/20 58/5 58/12 75/6
numbers [1] 58/14
O
oath [1] 3/11
object [5] 9/21 16/10 46/5 46/24 70/10
objected [1] 47/5
objection [100]
objections [1] 3/20
obtained [2] 73/21 73/23
obviously [1] 24/3
October [1] 1/10
office [9] 1/16 2/3 28/3 31/9 33/11 33/13 33/18 33/24 73/3
okay [11] 6/7 7/2 9/22 18/13 18/15 19/21 19/24 52/5 62/8 70/15 72/13
old [1] 12/19
Olivia [1] 31/14
once [2] 26/16 27/8
one [17] 6/9 11/14 11/17 16/15 19/5 27/12 27/18 29/18 32/8 32/14 37/17 46/23 53/20 54/8 56/3 56/14 59/19
only [16] 11/25 13/20 21/20 22/17 26/14 33/25 34/17 35/6 35/17 39/9 39/17 39/25 61/13 61/22 62/2 64/21
operate [1] 63/15
opportunity [1] 17/3
opposed [1] 47/19
opposing [1] 7/9
order [31] 44/13 45/21 47/21 48/4 49/20 50/2 53/19 53/21 56/17 58/22 60/11 62/15 62/20 63/7 64/4 64/16 65/2 66/19 67/20 68/3 68/22 69/2 69/10 69/14 69/17 69/19 70/19 70/20 71/5 71/17 73/6
ordered [1] 48/5
original [2] 3/8 3/16
other [30] 8/19 12/5 12/5 12/10 14/7 22/25 23/9 23/10 23/14 23/18 27/13 29/14 33/22 35/5 38/10 41/5 50/5 51/6 51/9 51/18 52/17 52/19 53/22 53/22 56/15 66/21 67/21 68/4 71/3 73/21
others [1] 24/21
otherwise [1] 7/11
our [10] 31/9 34/15 34/25 35/2 36/5 36/6 37/12 37/13 68/18 72/22
out [13] 18/9 26/15 30/8 33/21 37/25 38/13 50/3 57/11 57/16 70/5 71/5 72/8 73/5
outcome [1] 76/17
over [11] 20/20 33/2 38/16 38/20 39/11 46/19 48/11 49/2 61/25 66/9 73/12
own [4] 37/20 50/9 50/21 54/5
P
p.m [4] 1/11 69/6 69/6 74/16
page [14] 7/25 18/7 18/12 19/23 20/3 20/6 20/6 31/11 57/18 58/8 58/24 68/24 75/6 75/15
paper [1] 22/18
papers [2] 28/11 28/12
paperwork [1] 23/17
paralegal [4] 15/3 15/10 15/15 15/16
part [2] 30/19 55/17
particular [14] 16/16 16/24 24/20 32/9 33/6 43/21 45/10 45/10 48/11 48/22 48/24 52/16 53/12 53/13
parties [2] 3/6 76/15
Party [1] 1/13
past [1] 60/21
pause [1] 53/20
pay [1] 66/18
paying [3] 66/11 66/11 66/12

P
Penn [1] 14/18
people [12] 32/6 32/8 32/14 32/17 32/19 33/20 36/9 38/10 38/11 59/15 61/9 66/4
people's [2] 38/2 68/7
per [4] 15/25 16/4 16/8 16/14
percent [1] 66/8
perhaps [11] 16/2 25/14 40/14 49/4 49/16 53/20 53/24 58/21 68/17 72/10 73/16
period [7] 17/21 25/3 25/7 32/25 34/8 50/12 50/14
person [8] 32/2 37/17 38/24 40/16 49/18 72/20 72/21 72/22
personal [15] 16/2 44/25 48/17 48/21 50/10 50/15 50/21 51/5 51/7 51/13 51/18 51/24 52/2 54/6 55/12
Personnel [1] 40/6
persons [1] 31/21
phone [1] 28/5
phones [1] 15/17
pizzeria [1] 14/24
place [6] 15/2 37/18 49/18 50/13 54/4 68/20
plaintiff [6] 1/4 1/14 2/4 9/2 64/12 75/4
Plaintiff's [6] 6/12 7/16 18/2 30/25 31/6 56/8
Plaza [1] 2/10
please [7] 4/6 6/24 18/13 22/9 23/4 49/15 67/8
point [12] 27/18 34/4 34/11 34/13 34/21 34/22 35/3 36/4 37/10 43/5 43/20 55/10
policy [1] 39/18
portion [2] 45/24 46/6
possession [5] 8/12 8/14 8/20 10/7 10/9
possible [3] 24/9 60/15 63/24
practice [1] 24/11
preparation [1] 4/20
prepare [1] 28/4
prepared [1] 28/21
preparing [1] 30/6
PRESENT [1] 2/14
presented [2] 66/25 68/21
preserves [1] 47/6
pretrial [1] 24/5
pretty [3] 11/3 28/7 66/3
previously [1] 34/25
primarily [5] 24/23 26/24 27/16 29/16 31/21
primary [1] 32/4
principal [1] 19/7
print [3] 18/9 57/11 57/16
printed [1] 32/3
printout [2] 57/6 75/10
prior [17] 7/21 20/11 37/8 40/8 41/12 42/6 42/19 43/14 50/8 50/17 51/10 52/7 52/12 52/21 53/25 54/9 55/14
privilege [1] 5/14
pro [1] 25/15
probably [5] 7/23 12/8 58/2 68/14 72/16
problem [1] 53/5
Procedure [1] 1/16
process [5] 34/9 34/18 35/2 36/23 37/7
produce [1] 8/4
profile [1] 18/21
program [1] 39/25
Public [4] 1/19 4/4 74/24 76/7
pull [2] 50/4 56/17
punitive [1] 55/21
pursuant [1] 1/14
put [12] 22/23 23/2 24/5 28/3 36/19 41/17 45/6 47/15 59/16 59/18 59/22 69/16
putting [1] 69/13

Q
quantify [3] 12/8 58/13 61/2
Queens [4] 27/4 27/5 56/14 63/15
question [67] 5/16 5/17 6/3 6/23 7/3 7/6 7/12 9/24 10/2 10/4 11/25 16/11 16/13 18/22 21/8 22/6 22/22 23/21 24/2 25/2 25/20 28/16 29/24 35/12 35/13 42/2 43/7 43/22 44/10 46/4 46/9 46/10 46/13 46/15 47/6 47/17 47/18 49/4 52/4 53/7 54/12 61/15 62/11 63/4 63/20 63/21 63/22 64/9 65/10 65/12 65/14 65/24 65/25 67/6 67/8 67/10 67/12 67/13 67/14 67/19 67/25 70/16 70/17 71/15 71/16 73/4 73/5
questioning [1] 52/24
questions [2] 35/25 75/23
quickly [1] 58/20

R
RADLER [10] 2/8 4/24 5/3 5/9 5/12 5/18 5/23 9/10 9/16 9/20
random [1] 71/11
randomly [3] 49/22 71/10 73/2
range [2] 15/25 21/17
re [2] 10/2 67/7
re-read [2] 10/2 67/7
read [13] 10/2 10/4 18/22 19/21 22/8 22/9 42/3 46/12 46/15 65/9 65/12 67/7 67/10
ready [1] 49/17
really [2] 25/21 71/22
reason [3] 16/24 54/8 55/13
reasonable [1] 7/5
recall [7] 22/23 23/22 50/11 52/9 52/19 53/12 53/23
received [6] 28/11 72/2 72/7 72/10 73/14 73/15
recess [1] 69/5
recollection [1] 45/15
record [5] 4/7 22/9 42/22 70/13 76/12
referred [4] 10/3 46/14 65/11 67/9
referred-to [4] 10/3 46/14 65/11 67/9
reflect [2] 55/8 55/25
reflected [5] 62/18 63/9 64/6 70/21 70/25
reflecting [2] 8/25 9/19
regard [1] 14/21
regarding [10] 8/15 8/21 9/2 9/6 9/10 10/12 10/21 11/6 11/12 12/21
regular [3] 47/25 54/15 60/3
regularly [1] 22/19
related [1] 76/14
relation [1] 13/14
relationship [1] 9/19
reliable [2] 59/12 59/13
relief [1] 64/13
remember [8] 11/18 12/11 29/9 29/10 35/23 45/12 61/10 69/11
rent [3] 66/11 66/18 68/8
repeat [3] 9/24 35/11 42/2
rephrase [11] 6/25 7/4 25/21 29/17 35/13 39/21 42/5 44/10 54/11 65/8 67/12
rephrased [1] 65/24
reporter [9] 6/14 10/5 18/4 31/3 31/18 46/16 56/10 65/13 67/11
represent [2] 5/18 5/23
REQUESTED [1] 75/19
requests [1] 8/7
required [1] 40/16
reserved [1] 3/21
resolution [1] 24/10
respective [1] 3/5
respond [1] 28/5
responsibilities [5] 23/6 23/10 23/15 23/18 28/25
responsibility [5] 22/16 24/12 30/19 72/18 72/25
responsible [2] 31/21 33/21
responsive [1] 8/7
restate [1] 67/13
restaurant [1] 14/24
restraining [3] 38/25 39/2 40/8
restraint [2] 29/20 41/13
restraints [4] 32/13 32/15 32/19 32/23
result [3] 56/3 56/4 64/14
results [2] 67/5 72/6
retain [1] 5/9
retained [4] 5/12 5/18 5/23 75/12
retainer [1] 9/15
return [2] 35/21 56/19
returnable [1] 68/17
review [9] 7/20 18/13 20/10 35/4 37/21 37/22 38/21 38/23 38/24
reviewed [1] 52/7
reviewing [3] 23/16 28/12 35/7
right [31] 6/4 29/11 30/7 31/19 32/23 33/15 34/19 38/25 39/2 39/5 39/12 56/24 59/2 59/16 60/4 60/12 61/20 61/23 62/18 64/7 64/17 66/4 66/5 66/13 66/16 69/20 70/9 71/7 71/19 72/14 73/10
RIVKIN [10] 2/8 4/24 5/3 5/9 5/12 5/18 5/23 9/10 9/16 9/20
role [4] 36/13 36/20 37/5 44/12
RONALD [6] 1/13 4/8 14/5 14/7 14/10 74/20
rules [2] 1/15 6/16
RULINGS [1] 75/23
run [1] 65/23
RXR [1] 2/10
résumé [1] 75/8

S
said [11] 5/17 11/3 24/18 26/25 28/10 28/11 32/6 50/2 54/21 65/2 68/22
same [5] 3/11 3/14 3/16 32/18 38/24
saw [4] 66/19 67/19 68/2 68/25
say [19] 15/5 27/11 31/17 33/5 34/6 36/9 37/21 49/16 53/15 59/11 62/15 64/13 64/13 64/19 64/22 70/6 70/11 71/12 74/6
saying [9] 25/23 28/17 35/17 48/3 49/7 49/11 62/13 70/17 70/24
says [7] 19/7 19/13 19/17 20/2 22/7 31/13 31/13
scheduled [2] 55/7 72/12
school [2] 14/17 14/20
screen [3] 57/19 58/8 58/24
se [1] 25/15
sealing [1] 3/6
second [1] 69/16
secondary [1] 32/5
seconds [1] 58/16
see [22] 8/3 40/19 44/13 50/5 50/7 52/11 54/23 55/20 57/14 57/20 57/24 58/24 58/25 67/4 68/15 68/19 68/24 71/16 72/2 72/11 73/2 73/14
seemed [1] 26/8
seen [1] 55/5
send [1] 50/3
sent [1] 11/20
sentences [1] 19/21
serious [1] 66/3
served [1] 49/21
service [1] 3/15
set [2] 76/11 76/18
settlement [1] 56/4
she [1] 32/4
short [1] 69/5
shouldn't [1] 59/11
show [40] 7/15 49/20 50/2 53/19 53/21 54/25 56/5 56/20 57/2 58/23 59/5 59/6 59/7 59/9 60/11 62/15 62/20 63/7 64/3 64/4 64/10 64/16 64/20 65/3 66/20 67/20 68/3 68/22 69/2 69/10 69/14 69/17 69/18 69/19 69/22 70/19 70/20 71/5 71/17 73/6

S

showed [1] 49/23
showing [3] 31/5 59/2 60/10
shows [1] 64/15
sick [1] 26/16
sickness [1] 26/18
sign [34] 9/15 29/4 29/7 29/14 29/19 32/2 32/9 32/15 32/22 33/11 33/15 33/17 33/23 34/16 35/9 35/20 36/3 36/14 36/15 41/19 43/10 44/22 45/18 47/25 48/13 48/19 49/9 51/20 52/12 54/10 65/5 66/23 67/16 74/4
signature [1] 31/10
signed [13] 3/9 3/11 3/14 32/6 32/17 32/19 33/10 46/18 46/19 60/19 60/21 60/24 65/21
significant [3] 17/21 30/19 60/2
significantly [2] 25/6 25/10
signing [24] 29/10 31/22 35/5 36/18 41/22 42/6 42/7 42/19 43/14 44/3 44/5 45/4 47/22 48/10 50/9 50/18 51/10 52/21 55/14 55/21 61/19 68/6 73/8 73/20
similar [2] 18/11 18/20
simple [1] 21/8
sir [2] 6/18 14/12
site [3] 57/6 57/13 75/10
sitting [5] 51/17 51/23 52/5 52/9 52/18
situation [1] 16/16
six [3] 40/14 63/8 64/5
skiptracing [1] 37/17
Smiths [1] 38/12
so [38] 5/22 12/2 12/10 14/9 15/14 18/9 21/3 24/3 24/7 26/10 26/19 27/9 27/20 28/17 33/12 35/3 40/13 40/22 41/7 43/10 44/14 44/19 47/9 49/7 53/15 56/12 57/5 58/11 58/22 59/19 62/12 63/18 63/20 64/4 66/8 66/16 70/9 70/17
social [1] 39/6
some [9] 13/22 16/3 16/7 23/14 25/24 26/25 38/10 38/11 65/4
somebody [2] 33/11 33/24
someone [13] 24/7 33/18 33/22 34/14 35/8 35/19 41/7 66/11 66/25 67/2 68/21 70/19 70/24
someone's [11] 34/18 35/7 35/18 38/9 39/19 40/3 40/9 64/25 66/3 66/9 66/17
something [7] 26/17 33/7 50/5 56/17 59/21 60/10 68/20
sometime [1] 55/9
sometimes [10] 21/22 32/21 49/8 54/25 55/2 59/16 59/17 59/17 59/25 62/22
SOUTHERN [1] 1/2
speaking [6] 12/25 24/18 26/22 30/17 42/23 58/23
specifically [3] 45/13 53/23 54/21
spend [1] 48/9
spent [1] 27/21
spoken [1] 4/21
SS [1] 76/4
stage [1] 54/3
standpoint [1] 22/18
started [6] 25/23 26/5 27/7 35/14 35/23 38/17
state [10] 1/19 4/4 4/6 14/18 21/25 22/11 57/12 61/7 76/4 76/8
stated [1] 36/17
statement [4] 19/11 19/15 19/19 36/13
statements [4] 18/16 19/25 20/3 20/7
Staten [1] 63/13
STATES [1] 1/2
step [8] 6/9 36/22 40/17 41/17 52/16 52/19 53/13 67/4
steps [20] 39/10 40/7 40/15 40/19 42/9 42/14 42/17 43/12 44/21 45/2 45/9 48/17 50/16 51/9 51/18 65/4 66/21 67/21 68/4 68/12
still [3] 7/11 15/24 65/15
STIPULATED [2] 3/4 3/19
stipulation [1] 56/5
stock [1] 71/11
Street [3] 1/17 2/5 4/11
strike [7] 28/15 48/14 52/8 54/11 62/14 67/17 69/3
stuff [4] 15/16 16/2 16/3 28/6
submitted [3] 55/6 55/7 55/9
subpoena [8] 1/15 6/11 7/17 7/21 8/17 29/20 31/24 75/7
subpoenas [1] 29/8
Subscribed [1] 74/21
substantially [2] 18/11 18/19
such [3] 41/20 57/14 76/12
summary [1] 28/24
Supreme [3] 17/11 21/25 22/11
sure [12] 4/19 6/3 9/25 11/3 25/22 29/18 38/24 44/14 47/8 49/24 55/17 57/17
sworn [7] 3/9 4/3 15/18 70/22 74/10 74/21 76/11
system [8] 33/9 34/9 34/16 35/3 36/7 37/20 38/16 39/11
systems [2] 36/5 59/15

T

take [28] 6/9 11/15 19/5 42/9 42/17 44/20 46/23 50/16 51/8 58/11 58/15 61/6 62/3 64/24 65/4 66/8 66/16 66/20 67/3 67/4 67/21 68/4 68/7 68/12 68/20 69/4 71/11 72/8
taken [9] 1/14 6/18 39/10 40/8 42/14 43/12 52/17 52/20 69/6
taking [5] 14/23 61/13 61/22 62/2 65/4
talk [1] 62/12
talked [4] 30/5 30/7 39/16 69/8
talking [3] 32/25 38/14 44/8
tasked [1] 41/7
technologies [1] 37/25
technology [1] 37/12
tell [5] 10/19 16/8 20/18 21/23 23/23
telling [1] 9/9
ten [2] 58/14 58/16
terms [5] 23/3 30/9 39/10 39/18 40/2
testified [4] 4/5 46/2 46/6 48/15
testimony [13] 10/22 11/6 20/11 20/12 20/15 28/14 47/11 62/8 62/9 69/11 70/22 74/10 76/13
than [19] 11/14 11/17 12/6 14/7 23/11 24/21 33/22 35/5 41/5 42/25 43/4 50/5 51/6 52/17 53/22 58/15 63/8 64/5 73/22
Thank [2] 4/17 29/13
that [208]
that's [29] 5/15 8/18 14/9 22/3 22/7 31/19 34/15 34/17 35/16 39/9 39/16 42/8 43/7 43/22 44/17 47/4 54/7 55/11 56/3 58/8 58/24 62/8 62/9 62/11 64/6 64/21 66/3 72/19 74/10
their [7] 38/11 54/2 66/11 66/11 66/12 66/18 68/8
them [8] 10/20 32/2 33/11 33/21 53/18 53/18 61/3 62/5
themselves [1] 58/18
then [13] 16/19 28/21 33/17 33/23 47/10 49/19 49/25 53/19 58/24 61/15 68/25 72/10 74/2
there [79]
these [4] 8/7 58/2 59/15 66/4
they [22] 9/9 20/23 27/7 27/22 37/19 38/3 38/3 38/18 38/19 45/9 48/19 49/17 50/3 50/23 53/13 53/19 63/15 66/17 68/8 68/19 73/24 74/7
they're [6] 36/10 36/11 38/25 39/2 44/22 59/15
thing [8] 11/2 56/3 59/19 64/21 71/6 71/18 72/4 73/9
things [3] 38/20 42/16 63/16
think [17] 7/7 24/3 25/9 25/10 26/15 28/15 29/24 30/15 30/22 35/24 38/18 52/6 54/21 55/19 58/15 61/25 64/10
third [2] 27/6 53/20
this [69] 5/19 5/24 6/13 7/16 7/20 9/3 12/14 13/2 16/23 18/3 18/6 22/24 23/2 25/5 31/2 31/8 31/24 32/2 32/3 32/5 34/4 34/10 34/11 34/13 34/21 34/22 35/3 35/5 36/2 36/3 36/4 36/12 36/17 39/24 42/23 43/5 43/21 43/23 44/13 44/19 45/10 46/3 47/15 48/6 48/11 48/16 50/3 50/12 56/9 57/10 57/16 58/4 58/5 58/6 58/8 60/17 61/25 63/22 65/19 68/19 68/21 69/15 74/2 74/8 74/17 74/22 76/15 76/17 76/19
thorough [1] 37/14
those [6] 23/17 24/9 24/11 24/13 38/5 40/19
thousands [4] 45/18 46/18 46/19 47/23
three [2] 24/6 53/17
through [8] 15/11 19/22 22/14 35/6 35/15 46/20 65/23 69/3
throughout [2] 21/24 22/11
time [50] 1/11 3/21 6/10 15/11 15/15 19/5 21/2 22/3 22/13 25/3 25/7 25/25 26/7 27/6 27/7 32/2 32/9 32/24 33/3 34/4 34/8 34/11 34/13 34/21 34/22 35/3 36/4 36/17 38/16 38/17 38/18 39/23 43/5 46/23 48/9 49/7 50/12 50/14 52/6 52/10 59/20 59/25 60/9 60/14 63/5 63/25 64/4 64/6 70/19 74/15
timed [1] 26/18
times [1] 24/7
timing [1] 69/14
title [2] 17/14 17/17
today [19] 4/21 6/6 7/22 9/6 9/11 10/13 10/22 11/6 11/12 11/21 12/3 12/6 13/18 20/12 51/17 51/23 52/5 52/9 52/19
today's [1] 7/17
together [1] 22/24
too [5] 29/25 47/16 52/4 58/3 65/15
took [5] 37/8 45/9 48/18 51/19 53/13
totally [1] 63/17
track [1] 54/9
travel [1] 26/19
treat [2] 42/24 43/3
treated [2] 42/25 43/4
trial [4] 3/21 22/3 22/14 33/7
trials [4] 23/8 23/12 27/10 28/22
trigger [1] 53/14
true [12] 18/17 19/2 19/11 19/15 19/19 20/4 20/8 42/11 62/23 63/2 63/4 76/12
try [1] 63/4
trying [7] 11/23 25/22 30/4 30/8 44/11 47/13 73/5
Tuesday [1] 49/19
twice [1] 27/8
two [6] 25/15 27/4 32/8 32/14 37/19 53/18
two-attorney [1] 25/15
type [5] 56/18 57/20 58/12 58/16 58/18
typed [3] 28/20 57/25 58/4
typical [4] 20/24 21/12 28/6 28/8
typically [10] 21/3 21/7 24/18 28/18 32/22 58/23

T

typically... [4] 62/23 64/15 64/19 64/20

U

under [2] 20/6 66/4
underneath [1] 20/8
understand [10] 6/24 7/13 17/23 24/4 25/20 34/10 44/9 53/4 53/6 53/11
understanding [9] 6/3 12/13 12/17 12/20 13/2 13/9 34/8 37/24 38/4
understood [3] 7/6 34/25 36/5
uniformed [2] 63/19 63/22
Uniondale [1] 2/10
UNITED [1] 1/2
unless [1] 7/10
unsigned [1] 3/13
until [5] 15/14 16/22 16/23 55/9 67/24
up [9] 28/20 42/4 49/5 49/23 56/5 56/17 57/2 57/13 70/10
updated [3] 63/16 63/19 63/21
updating [3] 38/4 59/15 72/23
upon [1] 3/16
us [1] 73/24
use [2] 14/8 38/11
used [5] 3/13 36/6 47/12 47/12 60/3
usually [5] 14/8 16/6 62/18 63/9 69/22

V

vacate [9] 60/11 64/2 64/3 65/3 67/20 68/3 68/22 69/10 71/18
vacated [30] 40/20 40/24 41/11 41/16 41/23 42/11 42/19 43/14 44/6 44/23 45/5 48/20 49/11 50/8 50/17 51/10 51/21 52/12 52/21 54/17 54/23 55/22 56/2 56/4 60/8 65/19 67/3 68/6 71/13 74/7
valid [5] 42/15 49/6 49/19 50/25 74/2
varied [1] 20/23
varying [2] 22/2 22/12
vast [4] 56/13 60/8 70/18 71/4
venue [9] 23/16 26/23 27/12 41/7 55/3 56/22 60/15 62/12 63/5
venues [2] 24/19 26/24
verify [2] 38/2 42/15
verifying [1] 37/18
versus [1] 12/15
very [3] 26/18 35/24 50/23
VICTOR [3] 1/3 2/4 12/14
Vortsman [3] 1/19 76/7 76/22

W

wage [2] 29/10 66/10
wages [11] 34/19 35/7 35/19 39/19 43/2 64/25 65/5 66/3 66/4 66/9 66/17
wait [3] 67/24 70/2 70/2
waived [1] 3/8
want [5] 6/2 11/15 42/22 57/15 63/12
wanted [2] 71/4 71/16
was [99]
wasn't [6] 33/10 63/20 63/21 67/6 71/15 73/4
way [18] 17/21 25/13 27/2 29/18 33/2 36/5 37/2 37/15 39/17 47/17 54/22 63/16 63/18 63/19 65/17 68/15 71/3 76/16
we [24] 6/9 19/5 20/20 38/4 38/8 41/15 41/16 42/22 44/8 49/19 49/20 50/3 53/17 53/17 53/25 67/3 69/8 72/2 73/3 73/12 73/14 73/15 74/4 74/8
we're [4] 25/4 32/25 63/11 64/19
we've [1] 61/25
web [4] 22/4 57/6 57/13 75/10
week [4] 21/11 21/15 21/19 27/9
weekdays [1] 21/21
weekends [2] 21/20 21/22
well [24] 10/18 11/16 23/2 24/18 25/5 25/14 25/22 26/18 28/15 30/12 33/5 36/8 37/16 40/6 45/12 45/23 47/22 48/14 48/25 58/2 60/17 64/24 68/14 71/25
went [3] 14/23 17/5 73/12
were [48] 12/5 12/10 17/14 19/13 20/21 20/24 21/3 21/7 21/12 23/5 23/16 24/19 25/7 25/18 26/8 26/21 26/24 27/4 29/5 31/20 33/21 36/14 37/13 38/4 39/10 39/23 40/8 43/2 43/12 44/2 44/5 44/23 45/4 45/4 48/19 49/8 50/12 56/13 56/13 59/7 60/18 61/4 61/18 61/19 64/24 67/5 70/24 73/21
what [89]
what's [8] 7/15 12/20 13/9 19/3 31/5 56/20 72/4 73/2
whatever [4] 22/17 23/15 23/17 59/6
whatsoever [2] 61/11 61/20
when [36] 8/2 11/19 11/25 11/25 15/9 17/17 17/18 18/14 19/23 22/23 24/4 26/5 26/16 26/19 26/20 27/3 32/3 35/14 35/23 41/19 43/10 44/2 49/25 55/5 57/20 59/7 59/21 59/22 64/2 66/2 68/16 68/16 70/9 70/19 72/12 72/23
whenever [2] 24/3 28/2
where [15] 14/17 15/20 17/4 17/9 20/2 24/23 38/2 38/3 44/13 52/10 53/12 55/5 71/12 72/24 73/7
whereas [1] 40/13
WHEREOF [1] 76/18
Whereupon [10] 6/11 10/3 17/25 30/24 46/14 56/7 65/11 67/9 69/5 74/16
whether [25] 40/23 41/11 41/21 42/10 42/18 43/13 44/4 44/21 45/3 47/11 48/18 49/5 50/16 51/9 51/21 52/11 52/20 54/16 61/17 66/21 68/5 69/9 69/14 71/5 73/6
which [6] 7/17 17/7 24/15 28/14 46/6 46/10
while [8] 17/14 25/7 25/18 29/5 37/10 39/11 48/13 60/4
who [15] 4/23 5/3 10/15 10/18 10/21 31/21 31/25 32/6 32/9 32/14 32/17 32/19 33/21 72/21 72/23
whose [2] 43/2 76/10
why [9] 8/10 13/18 16/24 34/6 36/2 54/13 55/11 59/13 72/17
will [6] 6/24 7/25 22/8 44/10 47/10 47/17
within [3] 3/7 44/13 76/8
without [1] 9/8
witness [10] 3/9 3/15 3/17 4/3 44/16 47/14 74/17 76/10 76/13 76/18
won't [1] 55/2
wonder [1] 71/12
work [15] 14/22 14/24 15/22 16/21 17/5 21/15 21/23 25/6 25/9 26/10 28/10 28/12 30/5 33/12 38/3
worked [11] 15/2 15/3 15/10 15/18 19/17 21/20 36/5 36/10 37/10 39/12 60/4
working [5] 15/15 16/20 17/15 58/20 60/18
workload [3] 17/20 17/24 25/18
would [97]
would've [4] 32/4 35/4 65/20 74/8
wouldn't [6] 43/20 50/11 55/8 55/25 69/22 73/13
written [1] 8/24

Y

yeah [10] 17/2 18/24 21/19 23/14 27/22 29/12 43/8 61/8 64/15 69/12
year [3] 15/3 16/23 62/16
years [1] 49/3
Yep [3] 4/16 7/14 20/9
yes [38] 7/19 8/5 10/14 19/10 19/12 19/16 19/20 20/5 21/3 24/22 26/14 27/15 27/18 27/19 28/9 29/3 29/6 31/12 31/17 32/12 32/16 33/16 34/21 36/24 39/14 43/18 44/24 52/18 56/16 56/22 58/10 66/7 66/15 67/13 67/16 67/18 67/23 68/11
yes-or-no [2] 67/13 67/18
YORK [25] 1/2 1/18 1/20 2/5 2/10 4/4 4/12 14/15 21/25 22/11 27/14 56/14 56/23 57/12 60/18 60/20 60/25 61/4 61/9 61/19 62/16 63/7 63/25 76/4 76/8
you [315]
you'd [3] 19/6 27/13 72/13
you're [31] 7/10 7/11 7/17 8/2 11/22 13/18 18/14 19/7 19/23 22/25 28/17 30/2 38/14 41/20 41/22 44/14 45/9 47/9 49/2 49/7 49/11 52/15 53/11 55/21 57/12 61/6 61/15 70/18 73/5 73/8 73/20
you've [3] 18/22 63/13 63/14
your [91]
yourself [2] 8/25 19/22